

# EXHIBIT Z

Redacted

*Button et al v. Breshears*

Amended Complaint

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DUSTY BUTTON AND MITCHELL  
TAYLOR BUTTON

Case No: 1:24-CV-03757-MKV

PLAINTIFFS,

V.

**AMENDED COMPLAINT AND  
DEMAND FOR JURY TRIAL**

MADISON JANE BRESHEARS

DEFENDANT.

Plaintiffs Dusty Button and Mitchell Taylor Button file this Complaint and sue  
Defendant Madison Jane Breshears and allege as follows:

## NATURE OF THE ACTION

1. This is not a case of Plaintiffs “disagreeing” or “disapproving” false statements published about them on the internet; this case is an exemplary example of someone *egregiously* making and amplifying *knowingly* false and defamatory statements to a **mass** audience *proudly, publicly and repetitively*, as an orchestrated attack to destroy the livelihoods, businesses, careers and reputations of Plaintiffs though targeted deployments of defamation to the audiences whom were subscribed to every move that Plaintiffs made in their respective careers.
2. This case is about abuse of power, intimidation and the weaponization of the justice system by Defendant Madison Breshears, who *conspired and colluded* with third-parties to *unethically and unlawfully* violate Plaintiffs’ Constitutional rights to due process including by preventing Plaintiffs from seeking legal recourse against Defendant until now.
3. This case is about the perpetrator and Defendant, Madison Jane Breshears, who *exploited* her position of power and influence on social media and within the BAR community to orchestrate a false and defamatory foundation in order to assure the careers, businesses, reputations and well-known and respected good names of the Plaintiffs in this case were *entirely decimated*, thus crippling their finances and rendering them incapable of defending themselves against a fraudulent litigation which she had actual knowledge of but which Plaintiffs were completely unaware of; that was at the time being staged and led by Defendant’s friend Sage Humphries, who conspired with Madison Breshears to post false and defamatory statements about

Plaintiffs and use as public grounds to *gain an advantage* and litigate upon, on July 28<sup>th</sup>, 2021 when her complaint was filed in the District Court of Nevada<sup>1</sup>

4. This action arises from Defendants’ transmission and publication of *intentionally* false and defamatory statements made to hundreds of thousands of third parties about Plaintiffs Dusty and Taylor Button whereas, Ms. Breshears conduct amounts to actual malice or at the very least negligence and reckless disregard for the truth.
5. More specifically, as set forth in greater detail below, on Thursday, May 13<sup>th</sup>, 2021, Defendant Madison Jane Breshears took to her *anonymous* social media account, (@Real\_World\_Ballerina), to make outrageous statements on numerous occasions that Plaintiffs were involved in criminal activity including that they were sexual predators who could not keep employment because they groomed young girls and dancers for sex acts with them.
6. Indeed, the Defendant *knew* that Plaintiffs had never engaged in such heinous acts and were not otherwise found liable for any such crime or immoral disgusting acts.
7. Defendant Breshears proved through statements on a legally recorded phone call with Plaintiffs, on May 27<sup>th</sup>, 2024, that she knew the impact of her false and defamatory statements would be taken as true by *any reader or viewer* including because the context of the statements, she made were statements of fact to a **mass audience** as she stated that she had “evidence” and “proof” to substantiate her defamatory statements when in fact, she did not (as none exists), and still does not.
8. This action is about a woman who was *so desperate* for attention that she made public statements of fact which she knew would destroy the lives of two innocent people;

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<sup>1</sup> See case 2:21-cv-01412-ART-EJY – United States District Court of Nevada – *Humphries et al v. Button et al.*

who three years later, doubled down on her remarks by claiming the reason she posted the false and defamatory statements was because she “*did not know [Plaintiffs] were going to sue her*” and admitting that indeed, she had *no evidence or fact* aside from third-party hearsay to verify the nature of her defamatory posts, (she cannot).

9. Perhaps most *egregious*, Defendant admitted to collusion and conspiracy with various third-parties to intentionally cripple and impede on a lawsuit which would commence three months after her outlandish and defamatory statements were posted.

10. The Defendant knew that the New York Times article was coming out months prior to publishing, knew that a lawsuit would be filed months prior to a complaint being filed and as an attorney, chose to impede on Plaintiffs’ right to due process to gain an unlawful advantage in a legal proceeding as the Defendant knew that by crippling Plaintiffs’ defense against her defamatory posts three months prior that Plaintiffs would lose any all ability to work or generate finances to fund legal recourse against her or the lawsuit which would be filed three months later as Plaintiffs initially retained their attorney to discover and sue the owner of the anonymous account @real\_world\_ballerina for defamation prior to a lawsuit ever being filed by Sage Humphries.

11. The statements made by Defendant *were*, and are *now* and *forever* false in their entirety, and were made by Defendant with actual malice and/or with a reckless disregard for the truth given that Defendant knew her statements were patently and demonstrably false.

12. This case is about an attorney who abused her power to intimidate, harass and threaten Plaintiffs including on May 27<sup>th</sup>, 2024 during a legally recorded phone call with

Plaintiffs, where she threatened, intimidated and attempted to deter Plaintiffs from seeking legal recourse against her. The following statements were made by the Defendant on May 27<sup>th</sup>, 2024.

- “*I just want to tell you that it’s gonna be bad if you sue me.*”
- “*It’s not worth your time and energy or mine.*”
- “*There is consequences to filing frivolous or not legally viable lawsuits.*”
- “*As a lawyer, going through your complaint the causes of action that you are listing with the facts that even just based on im gonna write my motion to dismiss, im not going to be arguing the facts im going to be arguing the law and based on the law and the claims that you’ve made you haven’t stated a claim upon which relief can be granted so and that’s sanctionable.*”
- “*You shouldn’t be filing frivolous lawsuits.*”
- “*I don’t think it’s worth your time, it’s not gonna end well for you.*”

13. As described more fully herein, Plaintiffs have been involved in ongoing civil litigation in Nevada for *over three years* with a pending motion to dismiss and counterclaim which was filed August 23<sup>rd</sup>, 2023 and have been *pro se* against attorneys from Boies Schiller & Flexner LLP since October 22<sup>nd</sup>, 2022 consisting of three-hundred and seventy-eight publicly available docketed documents and nearly two-hundred documents which have been sealed pursuant to protective orders in the case whereas; Ms. Breshears’ statements have only incriminated her further by making statements which directly contradict information which she is unable to see or have

knowledge of but which proves her involvement and willingness to lie about that involvement and would be further proven through discovery.

14. Defendant made the defamatory statements against Plaintiffs, which were communicated and published to a mass audience of **hundreds of thousands** of third parties, with the *intent* to harm Plaintiffs given that, *inter alia*, Defendant was and is aware of the truth regarding Sage Humphries' previous relationship with Plaintiffs in 2017; but also, because her defamatory statements were prepared in advance in collusion with third-parties including the media as she "*knew the New York Times<sup>2</sup> was coming out with the article in a month or so but wanted to break the story first*", as stated by Ms. Breshears on May 27<sup>th</sup>, 2024.

15. Defendants' defamatory statements were intentionally published to provide traction for the New York Times article and complaint that Sage Humphries would pursue with no grounds, just three months following Defendants' defamatory posts; in fact, Ms. Breshears confirmed her defamatory statements were made with *actual malice* by stating on the May 27<sup>th</sup>, 2024 phone call that *she knew* The New York Times article was going to publish an article about Plaintiffs and that her posts would be the catalyst to that article stating, "*I did know, that's why I posted it*" and, "*If it was just Sage, I wouldn't have posted it...*", proving that her statements were made with *actual malice* as the only two individuals interviewed for the New York Times article were Sage Humphries and Gina Menichino, who Ms. Breshears admittedly, has never spoken to.

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<sup>2</sup> Plaintiffs are suing The New York Times Company and others including two attorneys from Boies Schiller & Flexner and their PR director including for attorney-media collusion and defamation amongst other claims; including that the New York Times published the article about Plaintiffs before Plaintiffs were even issued a summons – see case 1:24-cv-5888 in the Southern District Court of New York filed on July 29th, 2024.

1 16. Defendants' statements were made via an anonymous social media account with a  
2 large following of nearly **twenty thousand followers**, who reposted these defamatory  
3 statements whereas, they ultimately went viral<sup>3</sup> to the extent of a globally televised  
4 interview on a major news publication which in turn, *immediately* caused the  
5 destruction of Plaintiffs' businesses, careers, reputations, resulting in the termination  
6 of *all employment* for Plaintiffs then and forever.

8 17. As a direct and proximate result of Ms. Breshears' false and defamatory statements,  
9 Plaintiffs were evicted from their home in Nevada due to the inability to pay for their  
10 home as they lost any and all ability to work entirely and immediately.

11 18. Plaintiffs are on government assisted living such as the SNAP program in South  
12 Carolina and Medicaid, and are expecting the birth of their first child on August 8<sup>th</sup>,  
13 2024.

15 19. Plaintiffs have actual knowledge that substantial additional evidentiary support, which  
16 is in the exclusive possession of the Defendant and their agents and other third-parties,  
17 which will exist for the allegations and claims set forth above after a reasonable  
18 opportunity for discovery and including but not limited to because Defendant stated on  
19 the May 27<sup>th</sup>, 2024 phone call, "*I'll have to go back and look at texts to see if I knew*  
20 *that for sure...*" and stating on May 13<sup>th</sup>, 2021, "*all I can say is to this post alone, I've*  
21 *had multiple people who know victims and who have reached out*".

### 23 THE PARTIES

24 20. Plaintiff Dusty Button is an individual who resides and is domiciled in Myrtle Beach,  
25 South Carolina. Ms. Button is the wife of Plaintiff Taylor Button.

27 <sup>3</sup> Viral – relating to or involving an image, video, piece of information, etc., that is circulated rapidly and widely  
28 from one internet use to another.



21. Plaintiff Taylor Button is an individual who resides and is domiciled in Myrtle Beach, South Carolina. Mr. Button is the husband of Plaintiff Dusty Button.

22. Upon belief Defendant Madison Jane Breshears is an individual who resides and is domiciled in New York City, New York.

### **JURISDICTION AND VENUE**

23. Plaintiffs are citizens of the State of South Carolina for purposes of diversity jurisdiction under 28 U.S.C § 1332.

24. Defendant is a citizen of the State of New York for purposes of diversity jurisdiction under 28 U.S.C. § 1332.

25. This Court has original subject matter jurisdiction with respect to this action pursuant to 28 U.S.C. § 1332 as there exists complete diversity of citizenship between Plaintiffs and Defendant and the amount in controversy exceeds seventy-five thousand dollars (\$75,000.00), exclusive of interests and costs.

26. Pursuant to 28 U.S.C § 1391(b), venue is proper in this Court because the Defendant resides in this district.

27. The Court has general jurisdiction over Defendant as she is a resident of this State.

### **FACTUAL BACKGROUND**

28. Plaintiff Dusty Button was a *world-renowned* ballet dancer who trained at the Jacqueline Kennedy Onassis School at the American Ballet Theatre in New York City. In 2007, she joined the Royal Ballet School in London and in 2008 she joined Birmingham Royal Ballet in England.

29. In 2011, Ms. Button danced with American Ballet Theatre.

1 30. Ms. Button is best known for her work with the Boston Ballet, which she joined in  
2 2012 and was promoted to their highest position of principal ballerina in 2014.

3 31. Ms. Button was Red Bull's first and only ballet athlete and has been published in  
4 media publications across the globe and has positively influenced hundreds of  
5 thousands of people nationally and internationally, including by performing and  
6 teaching in over thirty different countries and across the United States.

7  
8 32. Plaintiff Dusty Button's Instagram account, @dusty\_button, at the time of the events  
9 described herein, amassed nearly half of a million followers and subscribers.

10 33. Ms. Button deleted her account in 2021 after succumbing to trauma from severe cyber  
11 bullying and harassment which Plaintiff endured as a direct result of Madison  
12 Breshears' defamatory publishing and remarks.

13  
14 34. Plaintiff Mitchell Taylor Button, (Taylor Button), was one of the world's *most*  
15 *influential* custom Ferrari and military vehicle designers and builders for seven years,  
16 approximately from 2014 – 2021, with his work having been published in media  
17 publications across the globe for his automotive design, builds and work in the  
18 industry.

19 35. Plaintiff has positively influenced hundreds of thousands of people nationally and  
20 internationally and has been procured from global organizations for speaking  
21 engagements and commissions that continue to live on with his legacy today despite  
22 the destruction of his life's work by Madison Breshears.

23  
24 36. Plaintiff Taylor Button's Instagram account, @button\_built, at the time of the events  
25 described herein, amassed nearly half of a million followers and subscribers.

37. Mr. Button deleted his account in 2021 after succumbing to the severe cyber bullying and harassment which Plaintiff endured as a direct result of Madison Breshears' defamatory publishing and remarks.

38. Plaintiffs' names and likeness *was* their business and generated one hundred percent of their yearly revenue whereas, Plaintiffs, themselves and what they provided to their respective industries *was solely* based on what they provided as their name brands, known as Dusty Button, Taylor Button, Mitch/Mitchell Button, Mitchell Taylor Button, "The Buttons", Button Built, Button Brand, Bravado by Dusty Button, Meisturwerk and Meisturwerk Maschinen.

39. Plaintiffs' established businesses, goods and services were directly sourced and provided from their good names, talent, expertise, reputations, skills, manufacturing and marketing capabilities, which were **completely destroyed** by Madison Breshears and her abuse of power and influence as a law student on social media through an anonymous account on May 13<sup>th</sup>, 2021.

40. Upon belief, Madison Breshears is a licensed attorney in the State of New York.

41. Upon belief, and at the time of the events described within the complaint occurred, Madison Breshears attended George Mason University Antonin Scalia Law School.

42. The Defendant is the owner and sole user of the anonymous Instagram account @Real\_World\_Ballerina, an Instagram page which is dedicated to satirical memes<sup>4</sup> and quotes in order to generate a mass following within the dance and ballet industries and communities that would supplement her own personal Instagram account, (@mjbreshears).

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<sup>4</sup> Meme definition – 1: An idea, behavior, style, or usage that spreads from person to person within a culture. 2: an amusing or interesting item or genre of items that is spread widely online especially through social media.

43. Ms. Breshears shared her actual identity on the anonymous page at the time most opportune to generate a following of her own; using the destruction of Plaintiffs to garner that following, (a following that could not be generated based on the merits of her talents alone and which are the very same lack of talents in the dance industry which led her to the decision to pursue law instead of dance).

44. Plaintiffs were not followers of Ms. Breshears' personal account or her anonymous meme account @real\_world\_ballerina and therefore, did not know who owned or ran the anonymous account at the time the events herein.

45. Plaintiffs Dusty and Taylor Button were the sole reason and target for Ms. Breshears' singular post **to date**, (after over fourteen years of activity on her anonymous account, established in 2012), that was relative to anything other than comedic satirical memes and self-obsession.

46. The defamatory publications Ms. Breshears so actively, proudly and aggressively shared while destroying Plaintiffs, have all been *entirely scrubbed* from her Instagram pages and any trace of these publications, (which led to death threats, physical harm, harassment, intimidation, cyber bullying and massive reposts of her defamatory statements), have been deleted.

47. Plaintiffs saved and documented these posts themselves, however, had they not, there would be *no trace* of Madison Breshears' responsibility for the defamatory and libelous posts and remarks following her spoilation of evidence once her education convinced her to destroy any trace of her illegal behavior.

48. A culture of defamation permeates the #MeToo movement, particularly in the entertainment industries and has in turn, destroyed the credibility of *real victims*

1 everywhere while simultaneously mocking the judicial system and enabling people to  
2 weaponize the civil justice system with false accusations, which ultimately have the  
3 same consequence on innocent lives as they would if they were true accusations  
4 against guilty parties, rendering Courts and parties afraid to defend against claims of  
5 this magnitude due to the nuclear social fallout.

6  
7 49. The culture of defamation has dialed the integrity of civil litigation back decades, as  
8 recently seen in cases around the world such as *Depp v. Heard*, *Bauer v. Hill* and more  
9 recently, the *Eleanor Williams* case in England, all of which proved innocent parties'  
10 lives were *completely destroyed* by false and defamatory statements.

11  
12 50. Other prominent dancers have been publicly defamed and severely harassed in past  
13 years, through fraudulent and defamatory statements online including but not limited  
14 to British dancer and choreographer Liam Scarlett, who sadly took his own life as a  
15 direct cause of false and defamatory statements in the media and through industry  
16 gossip.

17 “We feel Liam would not have taken his life if his name hadn’t been dragged  
18 through the press with inaccurate allegations”, stated by Deborah Scarlett,  
19 Liam’s mother.

20  
21 51. Liam Scarlett was cleared of any wrongdoing, but only *after* his death which included  
22 the false and defamatory statements of misconduct with children, which were *all*  
23 *proven to be false* statements but which were never acknowledged or rectified by any  
24 media source **to date**, much like the defamatory and false statements made by  
25 Defendant Madison Breshears.  
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52. As alleged further herein, Madison Breshears is a well-known member of the New York Bar Association as well as the dance community through her anonymous “meme” account, as a self-proclaimed “comedian”; as she, herself, was an aspiring dancer before becoming an attorney.

53. Ms. Breshears continues to enjoy success as an attorney while maintaining her “anonymous” account on social media, as she continues to post on her account @Real\_World\_Ballerina, harassing, defaming and threatening Plaintiffs and other innocent lives just as she did again, on May 27<sup>th</sup>, 2024, as explained further herein.

54. Plaintiffs have suffered *unimaginable* loss to their businesses, careers, reputations, finances, mental health, and overall livelihood and will continue to suffer as a direct and proximate result of Defendants’ conduct for the rest of their and their lives.

55. As stated previously, Plaintiffs are currently on government assisted programs in South Carolina, such as SNAP for food and Medicaid, as Plaintiffs are expecting their first child on August 8<sup>th</sup>, 2024.

56. Plaintiffs have *no income* and have generated *no income* since May 13<sup>th</sup>, 2021, as a direct result of Defendants’ defamatory statements and online harassment campaign against them.

57. Madison Breshears **intentionally, willfully and maliciously destroyed** Plaintiffs’ livelihoods, business and future ability to generate work or income in both of their respective industries for the foreseeable future, as their names, likeness and reputations were their business but were completely and entirely *obliterated* as a direct result of Madison Breshears’ harmful, harassing and defamatory statements.

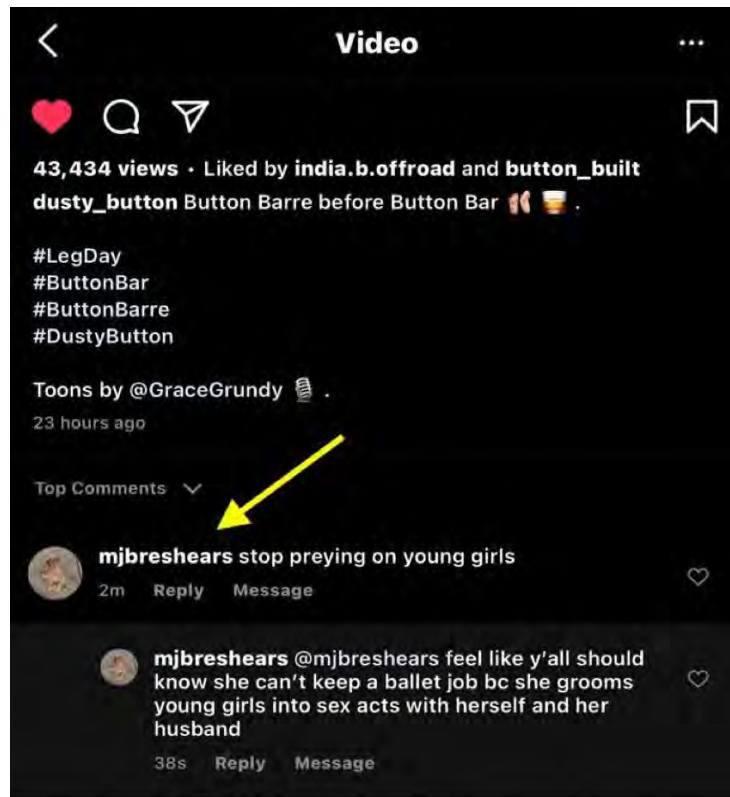
### **STATEMENT OF FACTS**

***Madison Breshears' Harassing and Defamatory Instagram Posts***

58. On May 13<sup>th</sup>, 2021, at approximately 6:00pm Eastern Time, Plaintiff Dusty Button was teaching a dance class to hundreds of students for her contracted employer, Braham Logan Crane at the dance convention Artists Simply Human, whereas, the dance class consisted of nearly 300 participants.

59. Around 9:00pm EST, Dusty received an initial attack of two false and defamatory public comments on her Instagram profile page in response to a video she posted of herself dancing from Defendant's personal Instagram account with the username, @mjbreshears<sup>5</sup> which stated the following:

"stop preying on young girls" and "feel like y'all should know she can't keep a ballet job bc she grooms young girls into sex acts with herself and her husband".



<sup>5</sup> @mjbreshears is Defendant Madison Jane Breshears' personal Instagram account.

1 60. Plaintiffs did not know of, or recognize the username @mjbreshears as her account  
2 was private and Plaintiffs did not know at the time that Ms. Breshears was working  
3 “behind the scenes”, and conspiring with her two childhood friends, Sage Humphries  
4 and non-party conspirator Hannah Stolrow to defame, harass and destroy Plaintiffs’  
5 lives.  
6

7 61. The verbiage and timing of this post was intentionally malicious as it was posted at the  
8 precise date and time that Plaintiff Dusty Button was teaching thousands of  
9 participants including but not limited to children and young dancers during the time  
10 this defamatory post was shared to hundreds of thousands of Plaintiffs’ followers on  
11 social media and who were present in her class or at the dance convention during that  
12 time.  
13

14 62. As admitted by Madison Breshears herself, on May 27<sup>th</sup>, 2024, she did not speak to  
15 anyone aside from Sage Humphries prior to making her defamatory statements, who  
16 was not a “young girl” at the time she (fraudulently) claims her allegations took place,  
17 including that she was nineteen years old at the time she had a consensual open dating  
18 relationship, (as proven in exhibits), with Plaintiffs in 2017; therefore, Ms. Breshears  
19 alludes to “young girls” having knowledge of only one **woman** who Plaintiff Dusty  
20 Button knew and had any relation to.  
21

22 63. As explained further herein, Defendant’s false and defamatory statements made  
23 intentionally alluded to children, though the statements made are false and defamatory  
24 in and of themselves; regardless, Ms. Breshears made her statements with actual  
25 malice knowing any viewer or reader would believe her statement as fact and given  
26 the context in which the statement was made.  
27  
28



64. At the time of the defamatory publications, Plaintiffs were surrounded by participants, parents and employers at the dance convention that weekend.

65. For nearly three hours, the account @mjbreshers continued to harass, bully and threaten Plaintiffs, repeatedly posting the same comment over and over again on Dusty Button's profile as Plaintiffs were deleting the unwanted and defamatory comment, until finally, Plaintiffs were forced to block and report the account on Instagram for harassing content, limiting the account from being able to access or comment on Plaintiffs' profiles.

66. Within seconds of Plaintiffs blocking the account @mjbreshers, a separate and anonymous account with the username @Real\_World\_Ballerina posted the defamatory and despicable posts which led to the downfall and complete destruction of Plaintiffs' careers, businesses, reputations and livelihoods.

67. As previously stated, *supra*, the account @Real\_World\_Ballerina, (which Plaintiffs discovered and confirmed in 2023, was owned and controlled by Madison Breshears), had nearly *twenty thousand* followers.

68. Nearly *twenty thousand* people had access to everything posted on the account, @Real\_World\_Ballerina, influencing those *twenty thousand* followers to repost and share the defamatory statements to *hundreds of thousands* of accounts and users on virtually every social media and communication platform, (i.e. Instagram, Facebook, Tik Tok, Snapchat, Reddit, text message, email communication, WhatsApp, and various other platforms).

69. Within *seconds* of Plaintiffs blocking and reporting, (what Plaintiffs now know to be Defendants' personal account), @mjbreshears, the following false and defamatory

statements were posted by Madison Breshears on her anonymous yet famous account,  
@Real\_World\_Ballerina:

**POST ONE BY DEFENDANT**

“PSA: DUSTY BUTTON IS A PREDATOR”



## POST TWO BY DEFENDANT

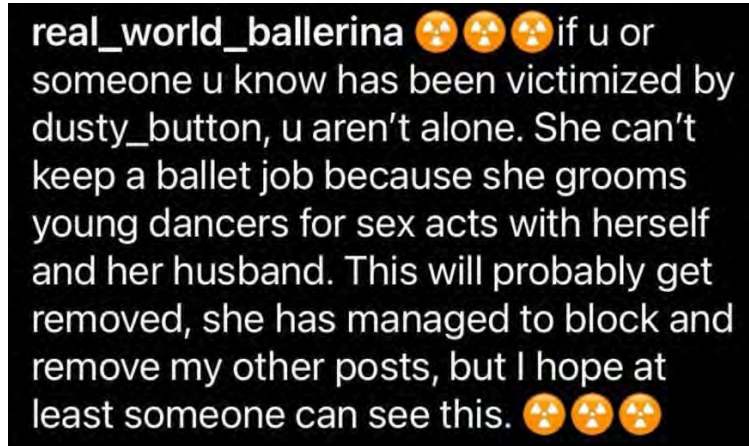
“This keeps getting removed. And she blocked me. But if you follow Dusty Button, you should know she can’t keep a ballet job because she grooms young girls to engage in sex acts with herself and her husband”.



### POST THREE BY DEFENDANT

“[toxic emoji], if u or someone u know has been victimized by dusty\_button, u aren’t alone.

She can’t keep a ballet job because she grooms young dancers for sex acts with herself and her husband. This will probably get removed, she has managed to block and remove my other posts, but I hope at least someone can see this [toxic emoji]”.



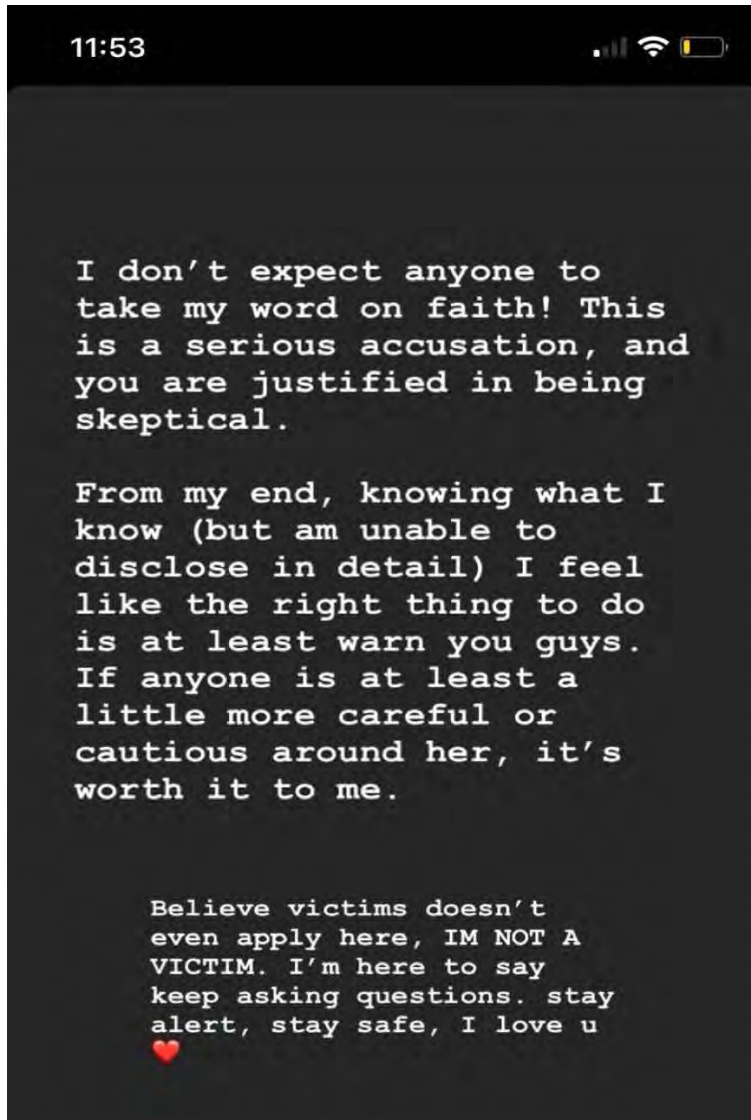
### POST FOUR BY DEFENDANT

“I have friends who have personally been victimized, or known someone victimized by @dusty\_button. Don’t give her a platform”.



1 **POST FIVE BY DEFENDANT**

2 “I don’t expect anyone to take my word on faith! This is a serious accusation, and you are  
3 justified in being skeptical. From my end, knowing what I know (but am unable to disclose in  
4 detail), I feel like the right thing to do is at least warn you guys. If anyone is at least a little  
5 more careful or cautious around her, it’s worth it to me.”  
6



70. Over the course of the next few hours, Madison Breshears continued to post threatening and harassing statements, commenting back to anyone who defended Plaintiffs or otherwise advised her that her statements were defamatory and libelous.

71. Rather than Ms. Breshears removing the defamatory posts, she stated she had “evidence” and “proof” of her defamatory statements that she would post and for her followers to “keep an eye out”, yet she failed to follow through with these claims to date.

72. Ms. Breshears never provided such “evidence” and “proof”, as none exists to back up her false and defamatory statements.

73. Ms. Breshears abused her power as an attorney and influential social media member of the dance community to ridicule and harass Plaintiffs and any third party who questioned her defamatory statements, including but not limited to the following responses from Madison Breshears to various third-party users who posted on her account in response to the defamatory posts.

74. Below are Madison’s public responses regarding her defamatory statements:

#### COMMENT ONE BY DEFENDANT

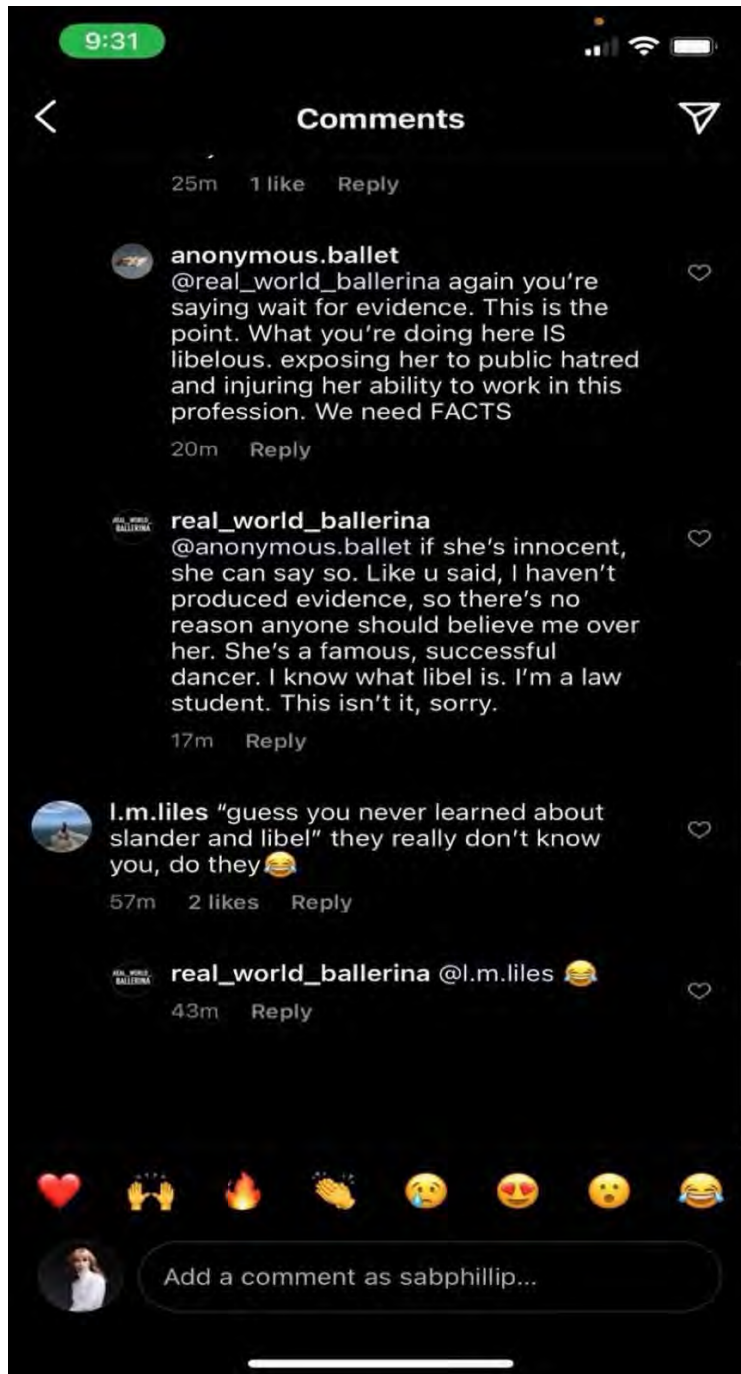
“I’m being threatened by dusty button’s henchmen?”





## COMMENT TWO BY DEFENDANT

“if she’s innocent, she can say so. Like u said, I haven’t produced evidence, so there’s no reason anyone should believe me over her. She’s a famous, successful dancer. I know what libel is. I’m a law student. This isn’t it, sorry.”



COMMENT THREE BY DEFENDANT

“not afraid. not even a little.”



COMMENTS FOUR AND FIVE BY DEFENDANT

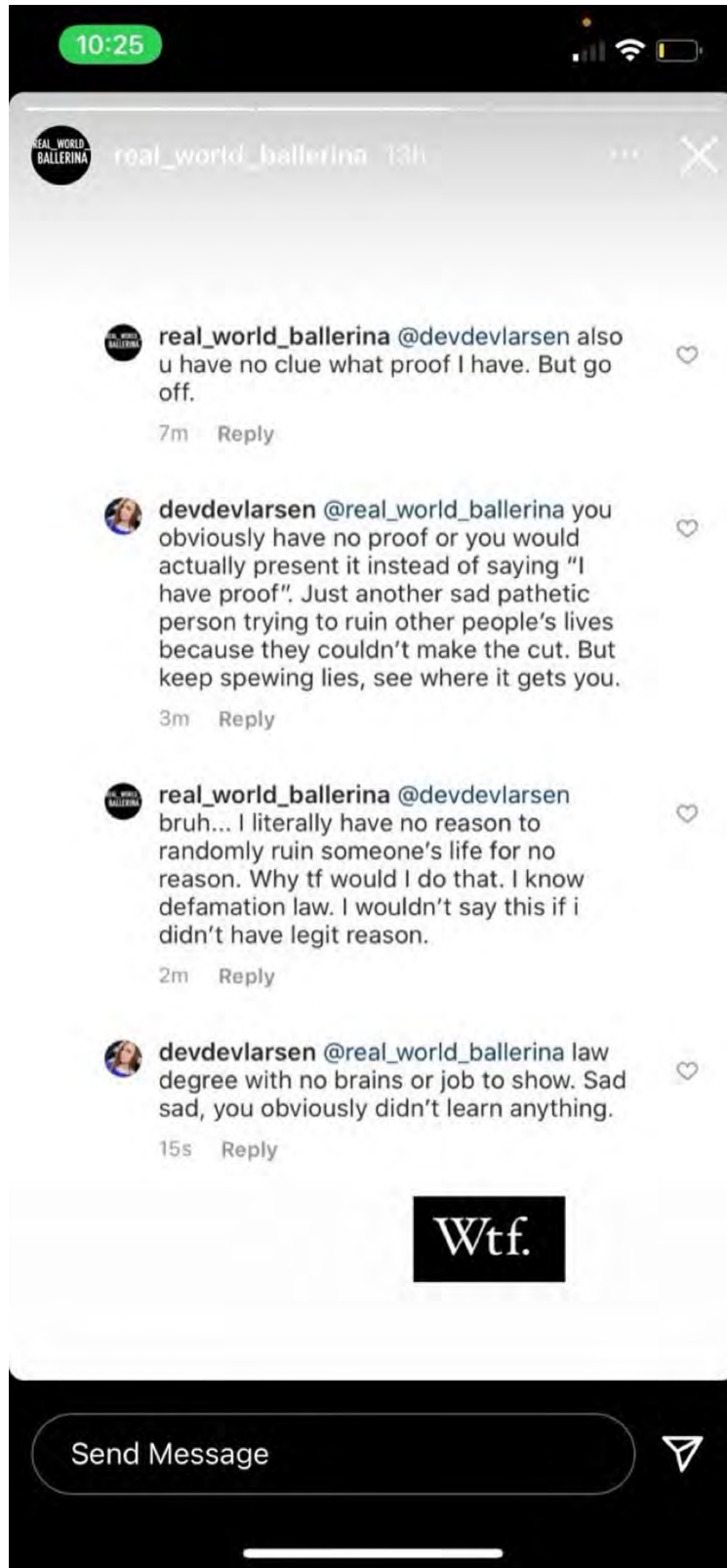
“also u have no clue what proof I have. But go off.”

“bruh... I literally have no reason to randomly ruin someone’s life for no reason. Why tf<sup>6</sup> would I do that. I know defamation law. I wouldn’t say this if i didn’t have a legit reason.”

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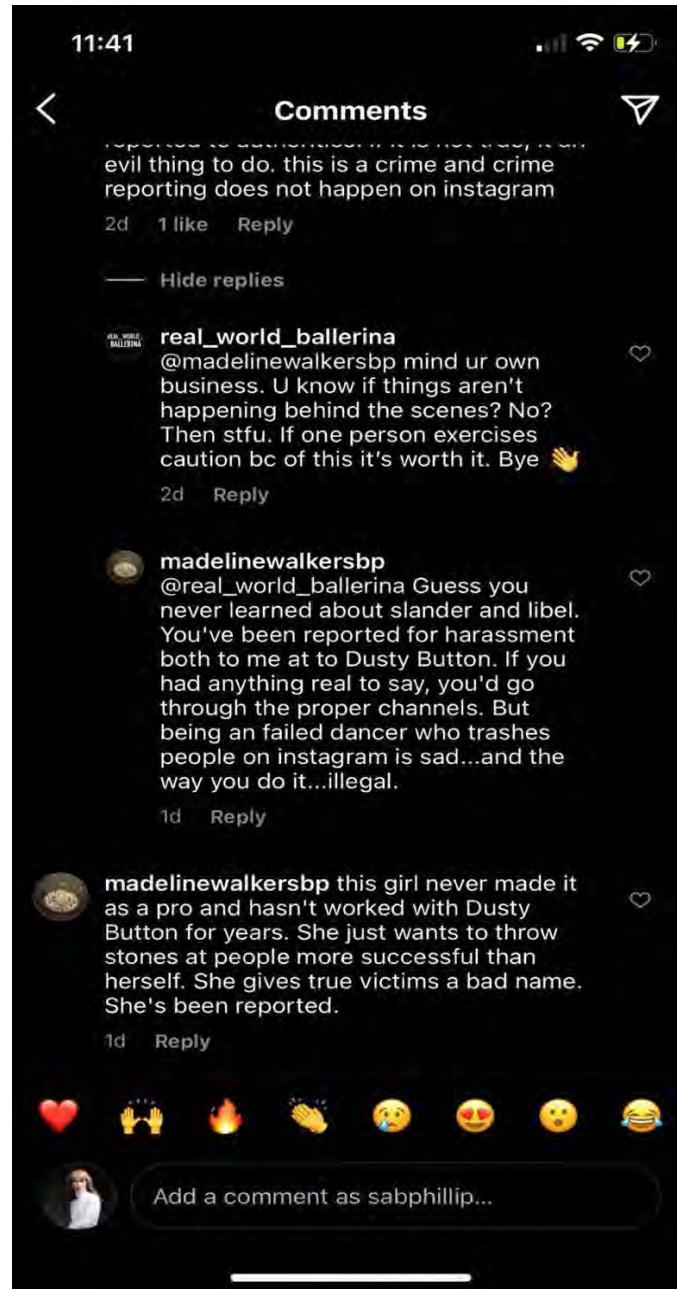
<sup>6</sup> Abbreviated for “the fuck”.





## COMMENT SIX BY DEFENDANT

“mind ur own business. U know if things aren’t happening behind the scenes?<sup>7</sup> No? Then stfu<sup>8</sup>. If one person exercises caution bc of this it’s worth it. Bye [yellow hand wave emoji].”

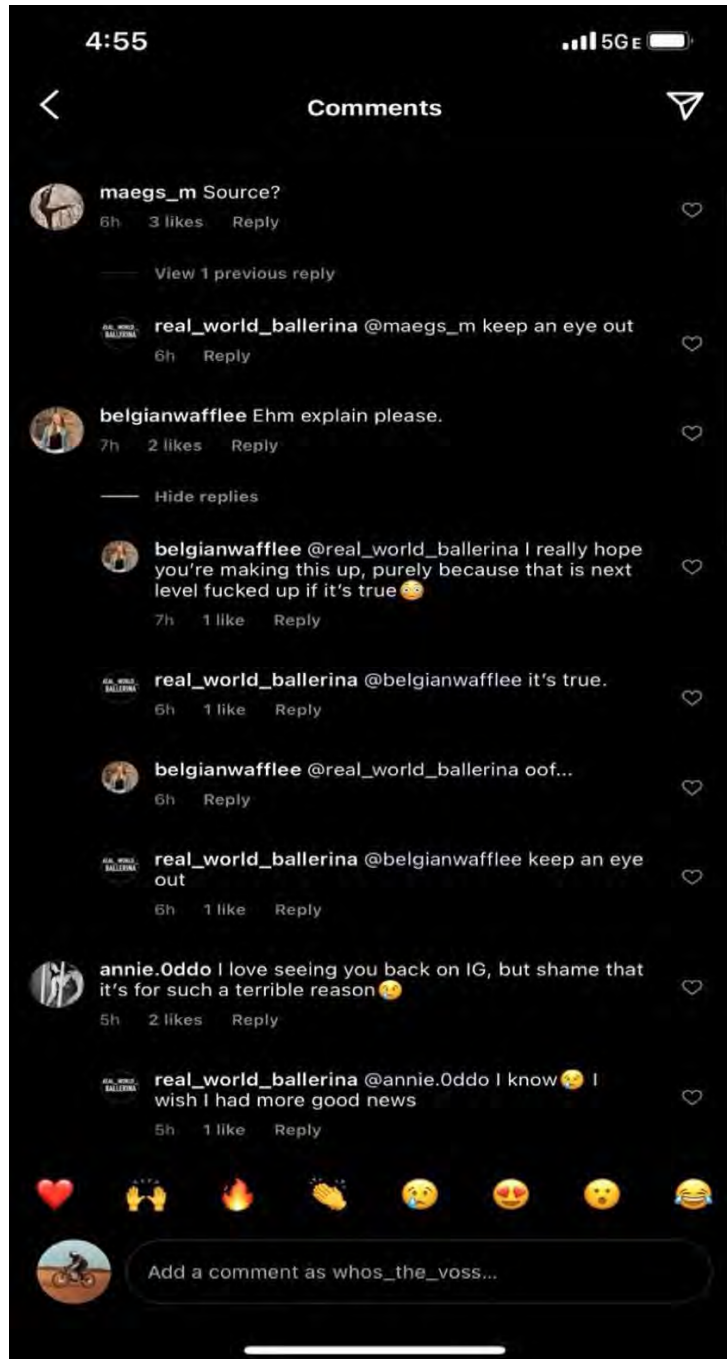


<sup>7</sup> “Behind the scenes” is Madison’s reference to the civil litigation which she was aware of, as she conspired with her best friend Sage Humphries to defame Plaintiffs leading up to the litigation, which was filed just three months later on July 28<sup>th</sup>, 2021.

<sup>8</sup> Abbreviated for “shut the fuck up”.

# COMMENTS SEVEN, EIGHT AND NINE BY DEFENDANT

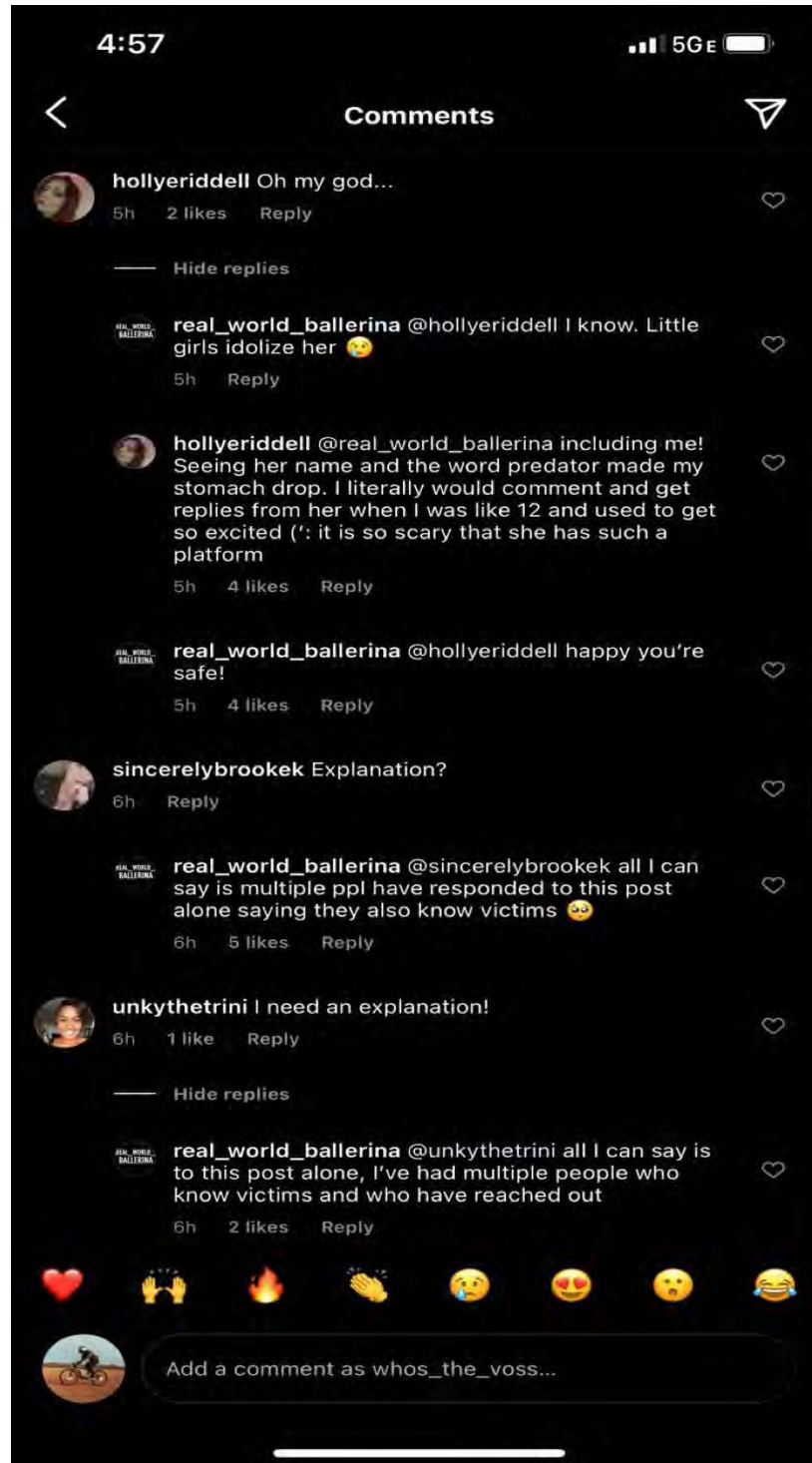
“keep an eye out”; “it’s true”; “all I can say is multiple ppl<sup>9</sup> have responded to this post alone saying they also know victims [sad face emoji]”.



<sup>9</sup> Abbreviate for “people”.

## COMMENTS TEN AND ELEVEN BY DEFENDANT

“I know, little girls idolize her”; “all I can say is to this post alone, I’ve had multiple people who know victims and who have reached out.”



75. As seen in the above posts, Madison Breshears led any reader or viewer to believe that her statements were substantially true, that she had proof and evidence, that her statements were fact and that Plaintiff Dusty Button could not keep employment because of her predatory behavior including by stating:

- “Knowing what I know (but am unable to disclose in detail)” – leading any reader or viewer to believe she knew something they did not but which would make her statement undeniably true and later admitting on May 27<sup>th</sup>, 2024 on a recorded phone call with Plaintiffs that she in fact had no evidence or proof, (none exists), to support her intentionally defamatory posts.
- “I have friends who have personally been victimized” - leading any reader or viewer to believe she had multiple friends who were personally victimized, later admitting on May 27<sup>th</sup>, 2024 on a recorded phone call with Plaintiffs that in fact, her only “friend” who she knew, and who had a dating relationship with Plaintiffs was a woman, Sage Humphries.
- “[Dusty] **can’t** keep a ballet job **because she grooms** young dancers for sex acts with herself and her husband” – leading any viewer or reader to believe this was an undeniable statement of fact including because the context of her statement was combined with the forementioned statements.
- “you have no clue what proof I have” – leading any reader or viewer to believe she had proof of the statements posted and that she knew something they did not in relation to the proof of the statements, later admitting on May 27<sup>th</sup>, 2024 on a recorded phone call with Plaintiffs that

she only ever spoke to Sage Humphries and had no proof (she cannot), and “If it was just Sage, I wouldn’t have posted it”, proving her defamatory statements were made out of actual malice.

- “it’s true” – leading any reader or viewer to believe her statements were substantially true, undeniable and that she had proof including because this statement was combined with other defamatory statements which alluded to criminal conduct and the context of the statement would have deceived readers to believe her statements as fact.

76. Ms. Breshears knew that her statements were false and defamatory as she *intentionally* destroyed Plaintiffs and their businesses, as well as their business relationships, causing intentional irreparable harm, knowing her statements were in and of themselves, false and defamatory and that she was in fact, “ruining” Plaintiffs’ lives by posting these defamatory statements, (as seen in the forementioned comments and photos).

77. As stated previously, Ms. Breshears’ anonymous account with the username, @Real\_World\_Ballerina, had amassed nearly *twenty thousand followers*.

78. Ms. Breshears’ personal account, @mjbreshears, had just a tiny portion of those followers at around one thousand.

79. Defendant intentionally used the account @Real\_World\_Ballerina as the platform to post harmful, false and defamatory statements as she knew it would “ruin” Plaintiffs’ lives, as the damage and destruction would be detrimental to Plaintiffs, rather than posting these defamatory statements from her personal account which had no impact on the dance industry, or any industry for that matter.



1 80. Plaintiff Dusty Button had nearly half of a million followers on Instagram, all of  
2 whom saw these defamatory statements, whereas employment, which was generated  
3 from Plaintiffs' Instagram page, (used for marketing products and services), entirely  
4 imploded in the weeks following Madison Breshears' defamatory posts.

5 81. Additionally, Dusty Button had over thirty fan pages created by other users who  
6 admired and idolized her and who routinely reposted photos of Dusty and events  
7 where she would be performing.

8 82. Due to Defendants' conduct, nearly all of Dusty's fan pages were transitioned and  
9 converted to "Dusty Button Hate" pages, reposting the defamatory statements posted  
10 by Madison Breshears and additionally, attracting hateful, harassing, defamatory and  
11 threatening comments as a direct result of Madison Breshears' defamatory and  
12 malicious statements.

13 83. Plaintiff Taylor Button had nearly half of a million followers on his Instagram  
14 account, all of whom saw these defamatory statements, whereas work, which was  
15 generated from Plaintiffs' page, (used for marketing products and services), entirely  
16 imploded in the weeks following Madison Breshears' defamatory post.

17 84. Plaintiffs began receiving death threats, death threats to family members, family  
18 members' communications that they, themselves had received physical threats of harm  
19 and death threats and other threatening and harassing public and private messages as a  
20 direct result of Defendants' conduct.

21 85. Ms. Breshears' defamatory statements about Plaintiffs were reposted *hundreds of*  
22 *thousands* of times, as the posts went viral.

1 86. The defamatory posts were sent to every employer, contractor, sponsor, co-worker,  
2 associate, friend and family member of Plaintiffs including by Madison Breshears,  
3 herself, in an attempt to spread the defamation across the largest platform possible.

4 87. Plaintiff Dusty Button has never lost work or been unable to “keep a ballet job” due to  
5 “grooming young dancers for sex acts with herself and her husband”.

6 88. Plaintiff Taylor Button has never lost work or been unable to keep a job due to “sex  
7 acts” with young dancers who were “groomed” by his wife or himself.

8 89. The statement made by Madison Breshears from her personal account @mjbreshears  
9 “stop preying on young girls” was deliberately and intentionally meant to harm  
10 Plaintiffs, knowing her statement was false.

11 90. Plaintiffs have never preyed on anyone; the defamatory statement which included the  
12 words “young girls”, in reference to children, were *intentionally chosen* by Defendant,  
13 while she knew her statements were false and defamatory.

14 91. Defendant *intentionally inflicted* harm on Plaintiffs by choosing words that would  
15 frighten children and the parents of those attending the May 13<sup>th</sup>, 2021 dance  
16 convention, as Dusty was teaching thousands of participants, including children and  
17 “young girls”.

18 92. The defamatory statements were seen by **millions of viewers** through the internet,  
19 social media platforms and messaging platforms as the post went viral on social  
20 media, accumulating more than half a million views including any and all followers of  
21 Dusty and Taylor Button in the dance and automotive industries.



- 1 93. These defamatory posts were reposted and shared hundreds of thousands of times  
2 including as attachments to emails and messages sent to Plaintiffs’ sponsors,  
3 employers, contractors, co-workers, friends and family.  
4
- 5 94. Defendant additionally posted her defamatory statements about Plaintiffs on TikTok  
6 by Madison Breshears, (which was later discovered by Plaintiffs in 2023), with the  
7 username @embresh.  
8
- 9 95. Defendants’ post on TikTok was viewed by hundreds of thousands of viewers,  
10 including being reposted and shared.  
11
- 12 96. Defendant knew that her statements about Plaintiffs were false and that they would  
13 “ruin” Plaintiffs’ lives and yet, made them anyway.  
14
- 15 97. Plaintiffs were prevented from confirming that Defendants’ anonymous account,  
16 @Real\_World\_Ballerina, was owned and controlled by her until the fall of 2023.  
17
- 18 98. Ms. Breshears has never issued an apology or retraction including by justifying her  
19 actions after calling Plaintiffs on May 27<sup>th</sup>, 2024 to intimidate and deter them from  
20 seeking legal recourse against her, proving she delusionally believes her actions were  
21 justified and that her position remains unchanged as she stated in 2021, in response to  
22 a third-party advising her of the consequence of defamation on her defamatory post:  
23 “Not afraid. Not even a little”, as a direct statement to Plaintiffs through social media.  
24
- 25 99. Moreover, Defendant intentionally made these defamatory posts and statements from  
26 an anonymous account to hide her identity and prevent consequence to her actions,  
27 proving that she knew they were defamatory.  
28
100. Defendant responded to third party users which informed her of her  
defamatory statements about Plaintiffs and continued to exacerbate the injury to

1 Plaintiffs by sharing the post to thousands of people following the initial post on May  
2 13<sup>th</sup>, 2021.

3 101. Defendant has since deleted any and all evidence of her defamatory statements  
4 and posts from the anonymous account @Real\_World\_Ballerina constituting  
5 spoilation of evidence as *she knew* her statements were defamatory and libelous when  
6 “ruining” Plaintiffs’ lives and later stating on the May 27<sup>th</sup>, 2024 phone call with  
7 Plaintiffs that she took them down because she had not been keeping tabs on the  
8 lawsuit and after looking, though it best to see how the lawsuit played out; further  
9 affirming her statements were defamatory and that she thought it best to remove  
10 association with the defamatory statements which implicated her.  
11

12 ***The Aftermath of Madison Breshears’ Defamatory Statements***

13 102. The impact of Defendants’ defamatory posts and statements was **catastrophic**  
14 to Plaintiffs’ business as they received *hundreds* of messages directly following her  
15 defamatory post canceling any and all contracted work and sponsorships for the  
16 foreseeable future.  
17

18 103. This resulted in millions of dollars lost in revenue, assets and income, as  
19 Plaintiffs’ businesses were destroyed.  
20

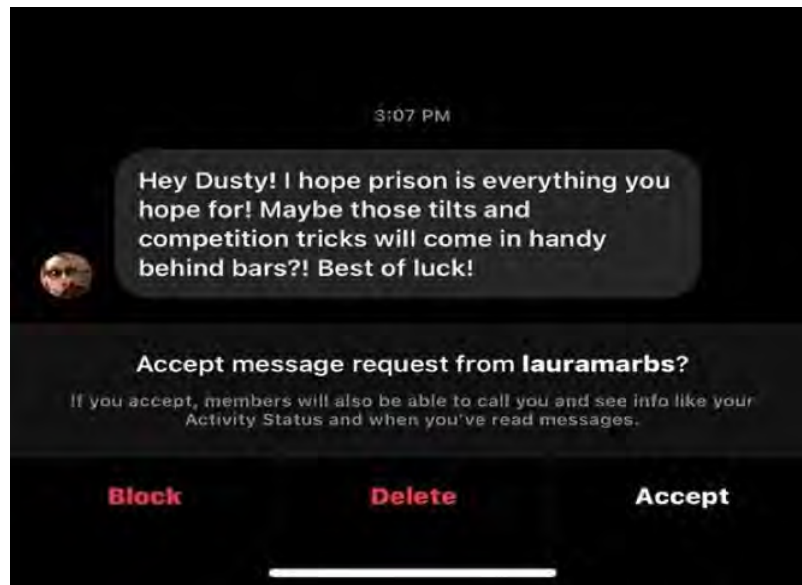
21 104. As seen, *supra*, Plaintiffs themselves, were their business, contracted by  
22 numerous private contractors which immediately ceased working with Plaintiffs  
23 following the May 13<sup>th</sup> Instagram post, including but not limited to contractors and  
24 sponsors who had not only employed and worked with Plaintiffs for *over fifteen years*,  
25 but who immediately disassociated themselves from Plaintiffs.  
26  
27  
28

105. Through the night of May 13<sup>th</sup>, 2021, Plaintiffs alternated sleeping to manage and check each other's phones which were full of notifications from social media, email and messaging platforms.

106. Plaintiffs were sent death threats and harassing messages, as hundreds of thousands of accounts reposted Defendants' defamatory post.

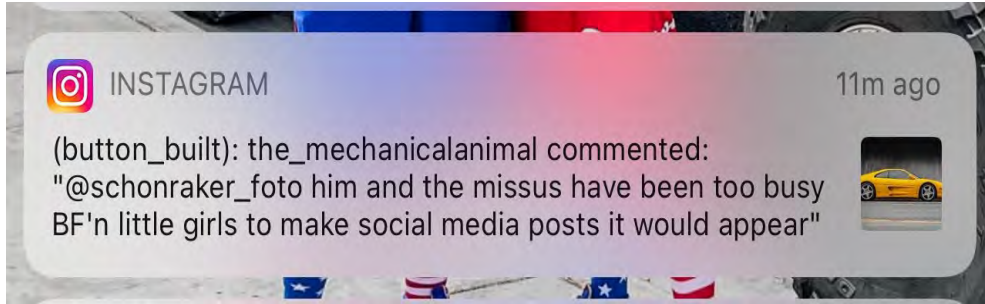
107. Following Madison Breshears' defamatory post, Plaintiffs were harassed so much so, that they received death threats and other extremely distressing comments and messages from various third parties as seen below:

- "Hey Dusty! I hope prison is everything you hope for! Maybe those tilts and competition tricks will come in handy behind bars?! Best of luck!" – Instagram user - @lauramarbs



- "@schonraker\_foto him and the missus have been too busy BF'n<sup>10</sup> little girls to make social media posts it would appear" – Instagram user @the\_mechanicalanimal.

<sup>10</sup> \*BF'n – abbreviation for "butt fucking" but which means "sodomizing"; in this case, a female child.



- “Hi! According to a recent post by @real\_world\_ballerina, dusty button is a predator who is not someone people should be looking up to! Just spreading the word.” – Instagram User - @cheryltanxr

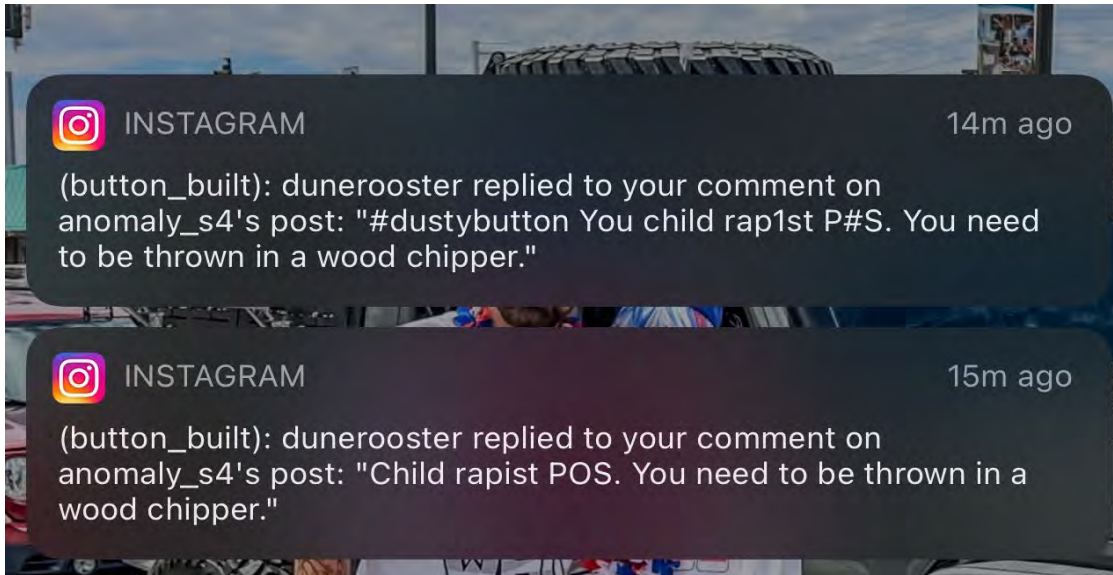


- “#dustybutton You child rap1st<sup>11</sup> P#S<sup>12</sup>. You need to be thrown in a wood chipper.” – Instagram User - @dunerooster

<sup>11</sup> Rap1st = rapist.

<sup>12</sup> P#S = Piece of shit.

- “Child rapist POS<sup>13</sup>. You need to be thrown in a wood chipper.” – Instagram User -  
@dunerooster

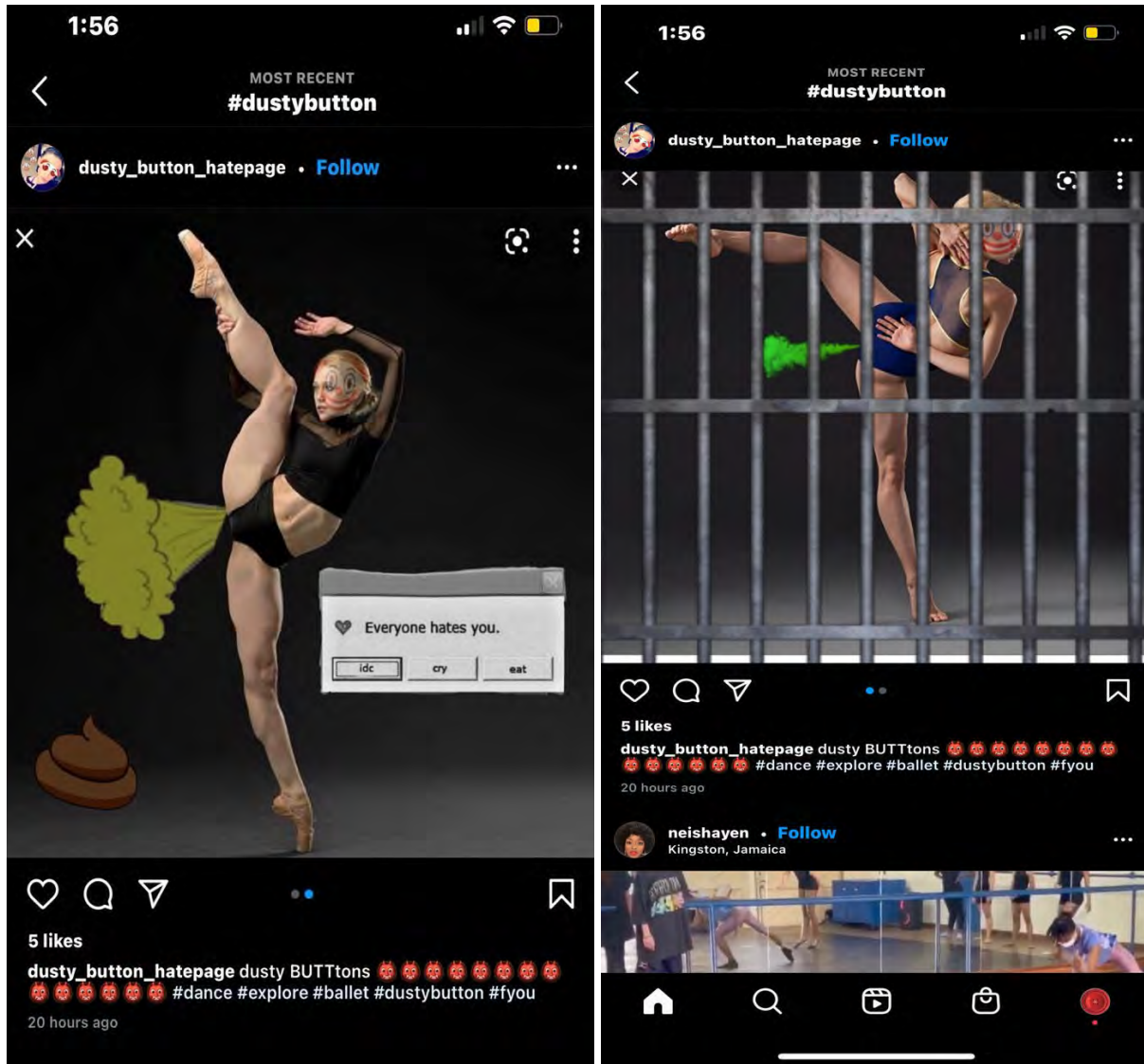


108. As another example, (as depicted by the screenshot below), following the initial post, numerous hate pages and accounts were created by Madison Breshears, her followers and various other third parties to bully, harass and threaten Plaintiffs as a direct result of Madison Breshears’ defamatory posts and remarks.

- Username – @dusty\_button\_hatepage

<sup>13</sup> POS = piece of shit.





109. This is just a *fraction* of the communications, notifications, threats and harassment which Plaintiffs received following Defendants' defamatory post, all of which Plaintiffs have documented and preserved for discovery.

110. At approximately midnight, Plaintiffs were contacted by the wife of the owner of Artists Simply Human, Brianna Valenti Crane, who immediately stated she was made aware of the post.

111. At this time, Plaintiffs were completely devastated and distraught that Ms. Breshears had posted such *egregious*, disgusting and **untrue statements**.

112. Ms. Crane stated she knew the defamatory statements were entirely false and meant to destroy Plaintiffs but suspected the defamatory statements were stemming from a conspired effort with Plaintiffs' ex-girlfriend from 2017, Sage Humphries, who had previously harassed, threatened and defamed Plaintiffs in 2017 with similar defamatory remarks sent to *every employer and sponsor* of Plaintiffs, one of which was Ms. Crane herself.

113. Plaintiff Dusty Button was asked by Ms. Crane to continue with the weekend as scheduled in an attempt to minimize the damage that this online attack would do to harm her company, thus teaching her next dance class at 8am on May 14<sup>th</sup>.

114. On May 14<sup>th</sup>, 2021, the harassment, threats and reposts of Madison Breshears' defamatory post only continued and in fact, worsened as Plaintiffs were forced to endure one of the most difficult days of their lives, walking through a dance convention full of thousands of participants; including parents, dance studio owners, teachers and children, all of whom had seen the defamatory post from the night before which stated Plaintiffs "preyed on young girls and dancers" and that Plaintiff Dusty Button could not "keep a ballet job" because she "grooms young dancers for sex acts with herself and her husband" thus believing that the people they once idolized were criminals.

115. Madison Breshears' defamatory posts were intentional as she was aware her statements were false and defamatory, knew the consequences of her intentionally harmful statements and that the damage to Plaintiffs' reputations and business would

1 be so *catastrophic* that it would, (in her own words), ruin their lives through  
2 irreparable damage.

3 116. At 8am on May 14<sup>th</sup>, 2021, Plaintiff Dusty Button taught her scheduled ballet  
4 class to a senior group of dancers aged fifteen and up, (including adults), whereas, it  
5 was one of the most traumatizing experiences Plaintiffs endured, as during the entirety  
6 of the class, both Plaintiffs' phones were receiving hundreds of thousands of  
7 notifications regarding the defamatory post by Madison Breshears.

8 117. On the evening of May 14<sup>th</sup>, 2021, Plaintiffs met with the owner of Artists  
9 Simply Human, away from the chaos of the dance convention created by Madison  
10 Breshears, at the restaurant Milkboy, located at 1100 Chestnut Street in Philadelphia,  
11 Pa to discuss the defamatory post which had already circulated and widely spread to  
12 hundreds of thousands of people and which had already been emailed to the company.

13 118. During the meeting with owner and director, Braham Logan Crane, Plaintiff  
14 Dusty Button was informed that she would not be allowed to teach the rest of her  
15 scheduled classes for the weekend and was temporarily suspended from the rest of the  
16 season to assess how everything "panned out".

17 119. Three weeks later, Dusty Button received an email from Braham Logan Crane  
18 prematurely terminating her contract *indefinitely* as a direct result of Madison  
19 Breshears' defamatory publications, resulting in a loss of half of a million dollars as a  
20 result of her long-term contract with Artists Simply Human and the endorsements that  
21 revolved around it.

22 120. The Defendant in this Complaint is solely responsible for the initial destruction  
23 of Plaintiffs' careers, reputations, and business.  
24  
25  
26  
27  
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1 121. While every statement made by Defendant was false in their entirety, the core  
2 facts of Plaintiffs', (whom these statements were made about), were equally inaccurate  
3 and false, which Madison Breshears had *actual knowledge* of.

4 122. Defendant stated that Plaintiff Taylor Button abused his power in the dance  
5 industry when in fact, he was *not even involved* in the dance industry in any capacity  
6 and in fact, was, until this defamation destroyed his business, a leading designer and  
7 builder of world-renowned Ferraris, race cars and military vehicles within the  
8 motorsport and automotive industry abroad.

9 123. Since making such false, malicious, and defamatory statements, numerous  
10 media outlets around the world have continued to quote Madison Breshears by  
11 wrongfully posting that Plaintiffs raped, groomed, sexually assaulted, drugged and  
12 trafficked young girls and dancers including by using these defamatory and egregious  
13 statements from 2021 as leverage and grounds for the New York Times article  
14 Madison Breshears was already aware of and for her friend Sage Humphries, to gain  
15 media attention leading up to the filing of her civil complaint against Plaintiffs on July  
16 28<sup>th</sup>, 2021.

17 124. At the time the events took place, Plaintiffs failed to understand that Ms.  
18 Breshears was *actually conspiring* with Sage Humphries and non-party co-conspirator  
19 Hannah Stolrow to generate public momentum for her malicious lawsuit which was  
20 filed against Plaintiffs three months later, in order for Ms. Humphries to gain media  
21 coverage and traction for her case, as well as cripple Plaintiffs finances and business,  
22 as it immediately terminated any and all employment for both Plaintiffs, intentionally  
23  
24  
25  
26  
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28

1 and severely hindering them from being able to fund a defense against fraud for  
2 themselves and relieving Madison Breshears from any responsibility.

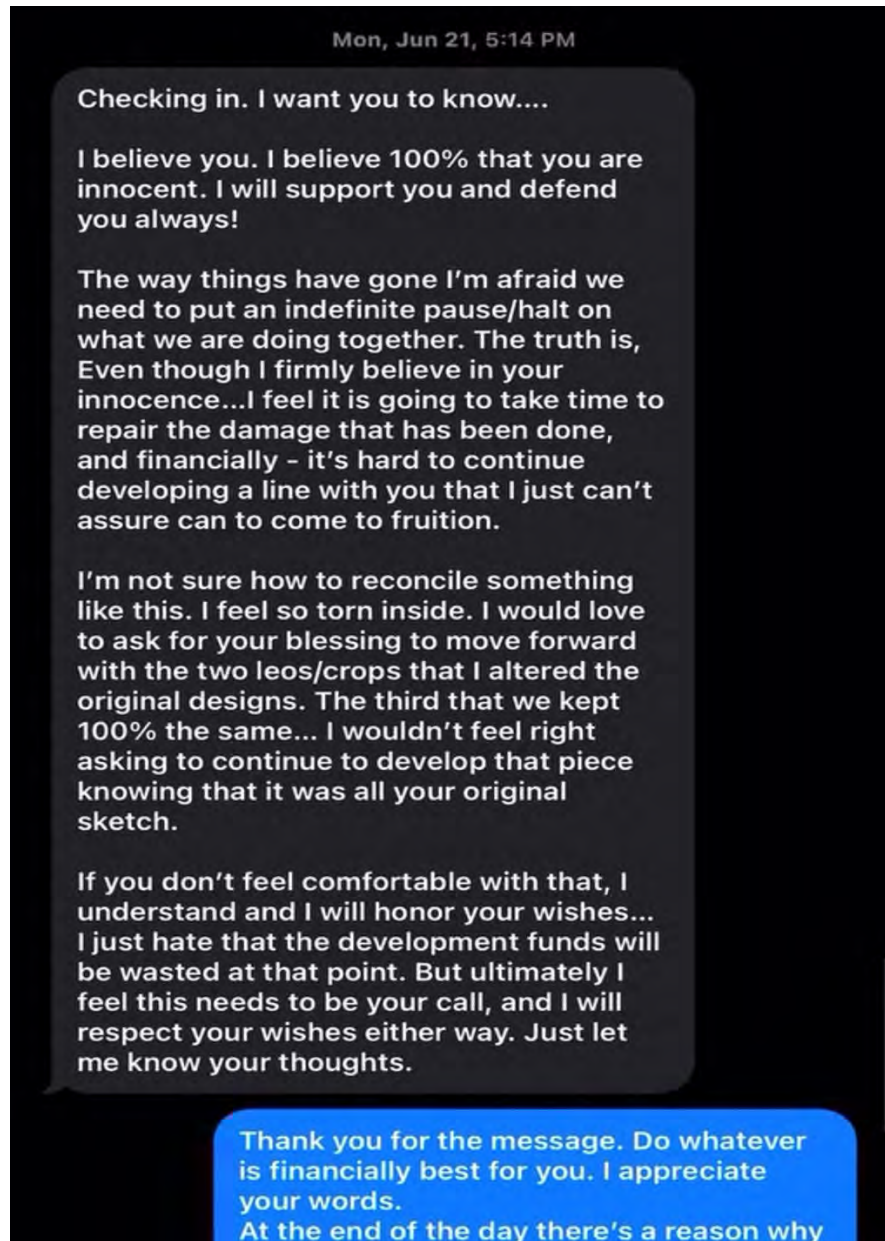
3 125. Defendants' defamatory post and the comments which followed were so  
4 traumatizing to Plaintiffs that they nearly, strategically took their own lives following  
5 the realization that regardless of the egregious, malicious and defamatory nature of the  
6 attack they were suffering, their lives and lifelong work would *never recover* once the  
7 world learned the **truth**, that they were exemplary models for those who idolized  
8 them.  
9

10 126. Madison Breshears knew that Plaintiffs would suffer extreme mental anguish  
11 and destruction to their reputations and business but chose to intentionally harm them  
12 anyway; in such a way that they would not be able to recover mentally, spiritually or  
13 financially.  
14

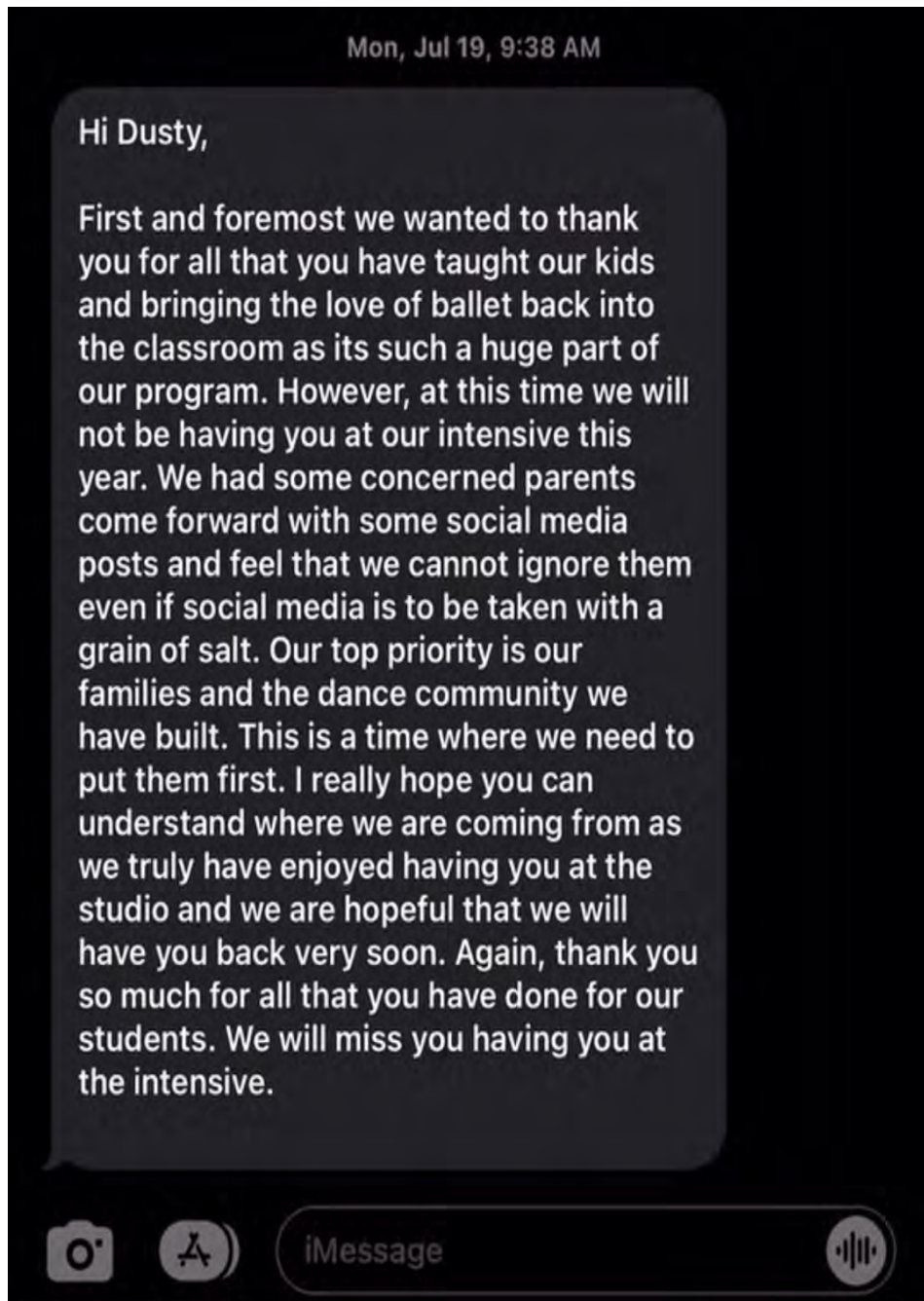
15 127. As a direct result of Madison Breshears' defamatory statements, Plaintiffs'  
16 business, careers, reputations, livelihood and ability to generate income was  
17 completely destroyed.

18 128. As one example, Plaintiffs received numerous emails, text messages and other  
19 communications from their sponsors, employers and contractors cancelling any and all  
20 work as a direct cause of Madison Breshears' defamatory post including but not  
21 limited to the following messages:  
22

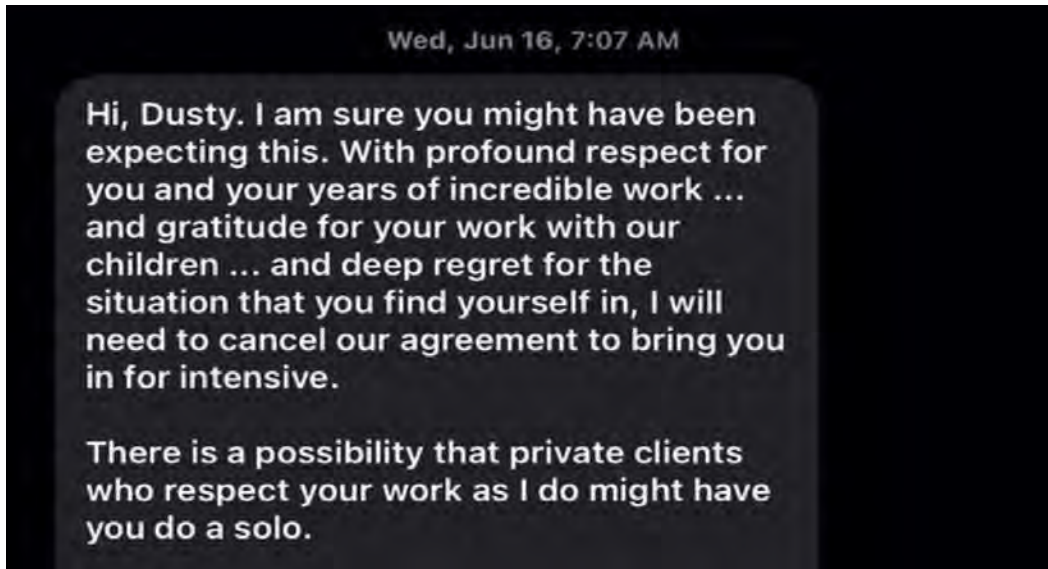
- 23
- 24 • Text message from Bree Hafen to Dusty Button, notifying Plaintiff of terminated  
25 agreement and negotiations regarding a collaboration as a direct result of Defendants'  
26 conduct.  
27  
28



- Text message from Shelby Richardson notifying Plaintiff of terminated agreement and negotiations regarding a collaboration as a direct result of Defendants' conduct.



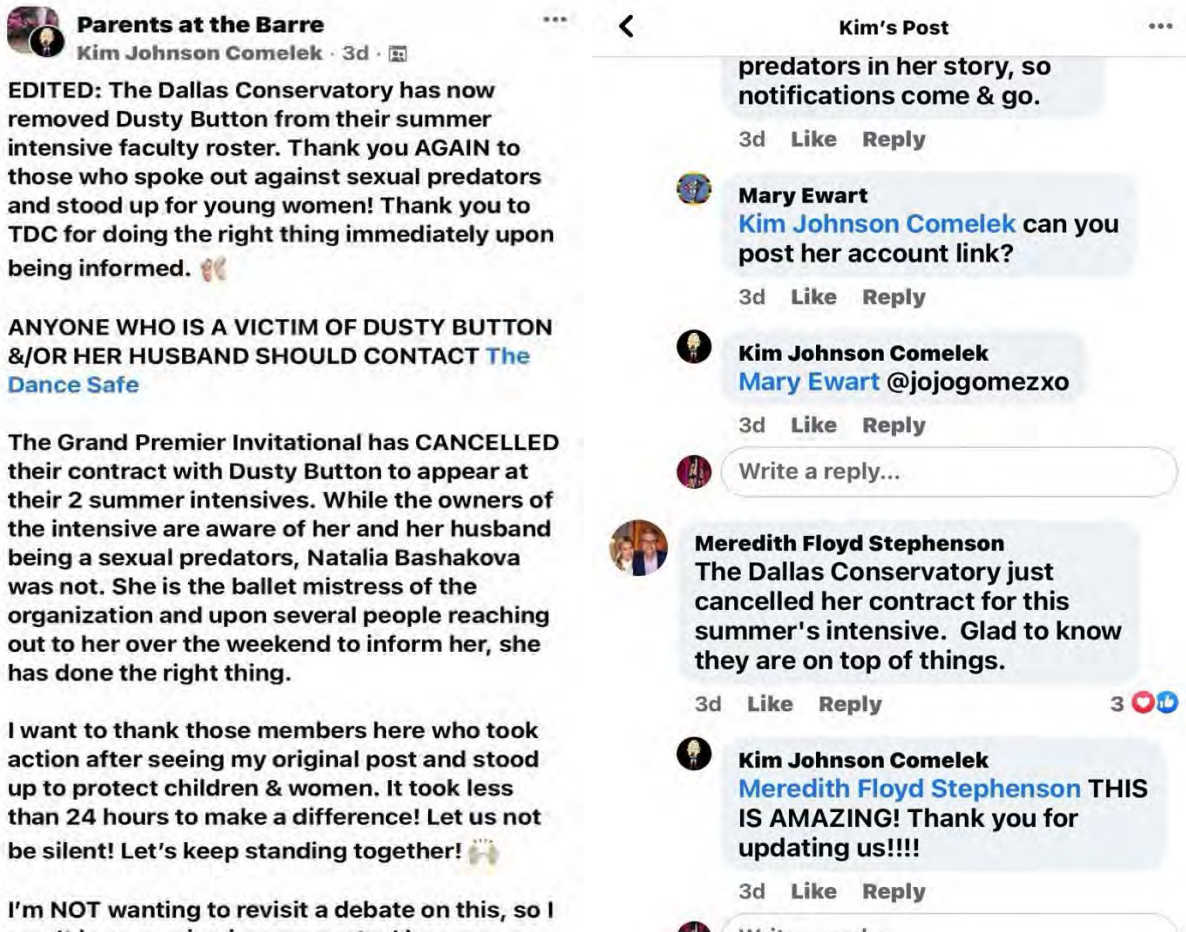
- Text message from Jacqueline Porter, (with the Dallas Conservatory), notifying Plaintiff of terminated agreement and negotiations regarding a collaboration as a direct result of Defendants' conduct.



129. These messages are just an example and a *tiny fraction* of what Plaintiffs suffered by way of loss of business and employment.

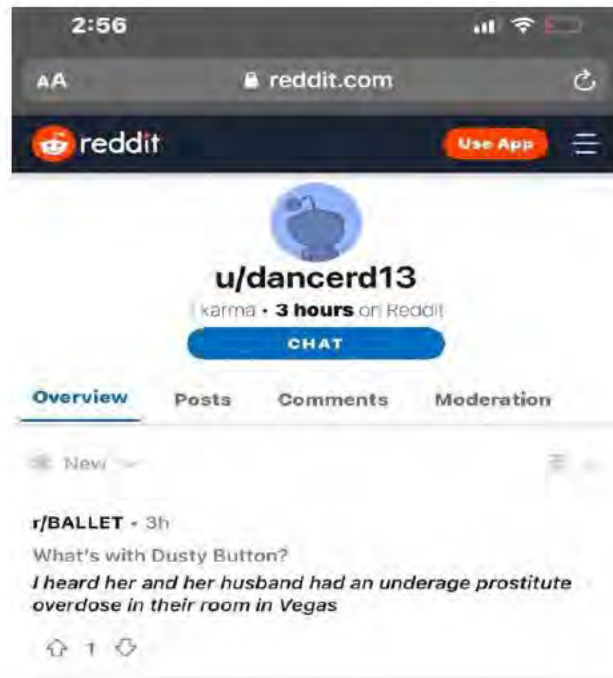
130. As another example; as a direct result of Madison Breshears' defamatory post, an entire forum discussion was started to additionally defame, harass and threaten Plaintiffs, and additionally update the forum on cancelled business in which third parties were conspiring with Madison Breshears and Sage Humphries to send defamatory messages to Plaintiffs' employers, contractors and sponsors as seen in just a few examples below:





131. As a direct result of Madison Breshears' defamatory post, an entire Reddit discussion was created to further spread this defamation, harass, shame, embarrass and threaten Plaintiffs including defamatory posts from "anonymous" users associated with Madison Breshears, non-party Cat Cogliandro and Sage Humphries which further destroyed the reputations of Plaintiffs including but not limited to the following screenshots below:

- "I heard her and her husband had an underage prostitute overdose in their room in Vegas" – anonymous user on Reddit known as u/dancerd13.



- Reddit thread created to defame Plaintiffs as a direct result of Madison Breshears' false and defamatory statements – Username @scarletdancer.



132. Further examples of defamatory and harassing posts as a direct result of Madison Breshears false and defamatory remarks are below:

- “Now that it’s finally public that Dusty Button is a sexual predator, don’t you think it’s time ya’ll stop following her on Instagram? That your children stop following her? That your company stops following her? Who we follow is a reflection of our own values. Do you share the values of a sexual predator?” – Username: Kim Comelek





- “Yikes. Who MAKES us set goals that we can ONLY reach with them” [eye roll emoji]. Yeah, congrats on achieving your abuse goals. Wonder if sexually assaulting minors was worth your career dissolving over. You’re not enough for him; you never were, never will be. You can not be the missing piece for a sociopath and pedophile.”



- “like not to be crazy but can we tag all her recent gigs and any other dance competitions bc she shouldn’t be working with children”. – Instagram user @bae.hamas.



- “Pedo” – Instagram user @royalt\_xo



- “Care to address your partnership with @dusty\_button considering the latest accusations against her?” – Instagram user @blossomandbranchfam to Plaintiff’s sponsor BLOCH Inc.

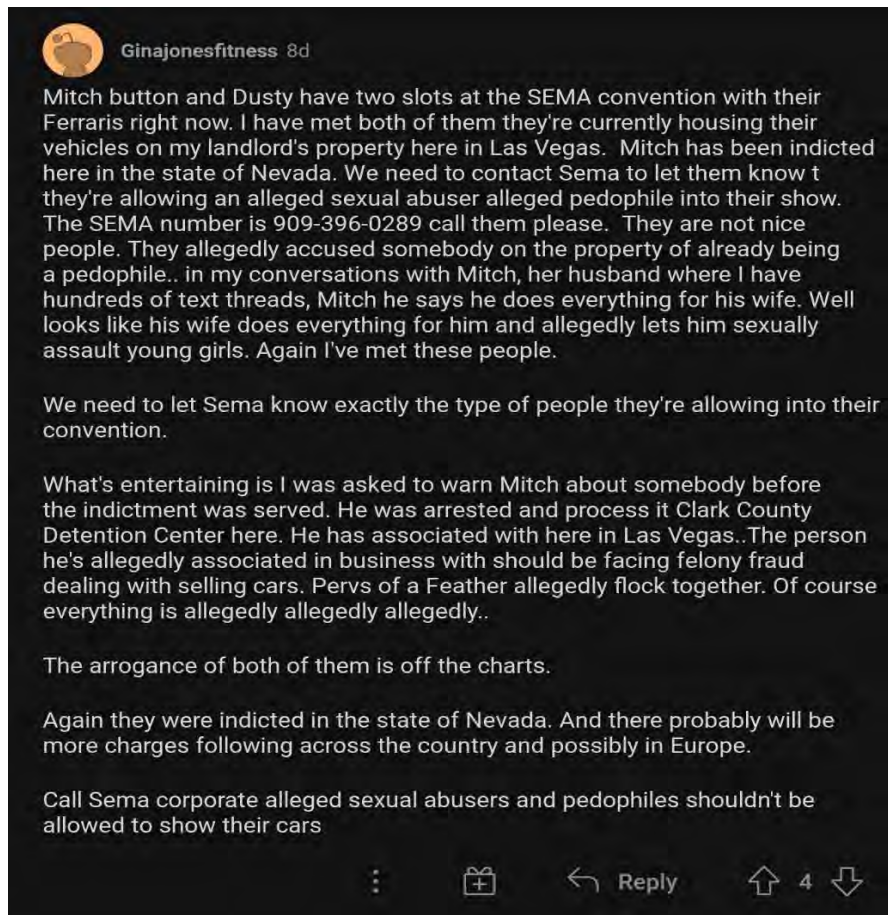


133. The defamatory posts by Madison Breshears were collectively reposted hundreds of thousands of times and additionally exaggerated and manipulated, constituting further harassment and defamation to Plaintiffs as a direct result of Defendants’ malicious conduct.

134. Importantly, the decisions of those to selectively repost the defamatory statements made by Madison Breshears, explicitly and falsely stating that Plaintiffs preyed on young girls and dancers to groom them for sex acts with each other, further evidences the widespread impact of false information initiated by Madison Breshears’ defamatory remarks.

135. Relying on the defamatory statements made by Madison Breshears, numerous third parties published that Plaintiffs were “child rapists”, “pedophiles”, “predators”, “sexual deviants”, “groomers”, “dangerous, and “should not be around children”, amongst many other egregious and despicable descriptions, as a direct result of Defendants’ defamatory remarks.

136. As another example, Gina Jones, a user on Reddit, falsely stated that Plaintiffs were criminally charged and indicted in the state of Nevada, demanding others to call the owners of one of the largest motorsport events on the planet, (that Plaintiff Taylor Button headlined each year), SEMA, where Plaintiffs were scheduled to make a guest appearance and debut another world-renowned vehicle for the dozens of sponsors and employers that they were contracted to.



1 137. Plaintiff Taylor Button's appearance and business at SEMA was cancelled, as  
2 a direct result of Madison Breshears' defamatory post, thus prematurely breaching his  
3 contracts to dozens of sponsors resulting in repossessions and accrued debt.

4 138. The above-referenced posts, reposts, forum discussions and messages, are only  
5 a *fraction* of the social media posts and articles that have surfaced since the release of  
6 Madison Breshears' defamatory post on May 13<sup>th</sup>, 2021.

7 139. Defendants' false and defamatory statements about Plaintiffs immediately  
8 spread like wildfire, as hundreds of thousands of third parties repeated and reposted  
9 the defamatory statements to countless viewers.

10 140. All of the above-referenced defamatory posts and statements have resulted in  
11 damages to Plaintiffs due to the false and misleading statements posted by Defendant  
12 and in subsequent posts and reporting by Defendant and other outlets.

13  
14  
15 ***Defendants' Account @Real\_World\_Ballerina and the Spoilation of Evidence***

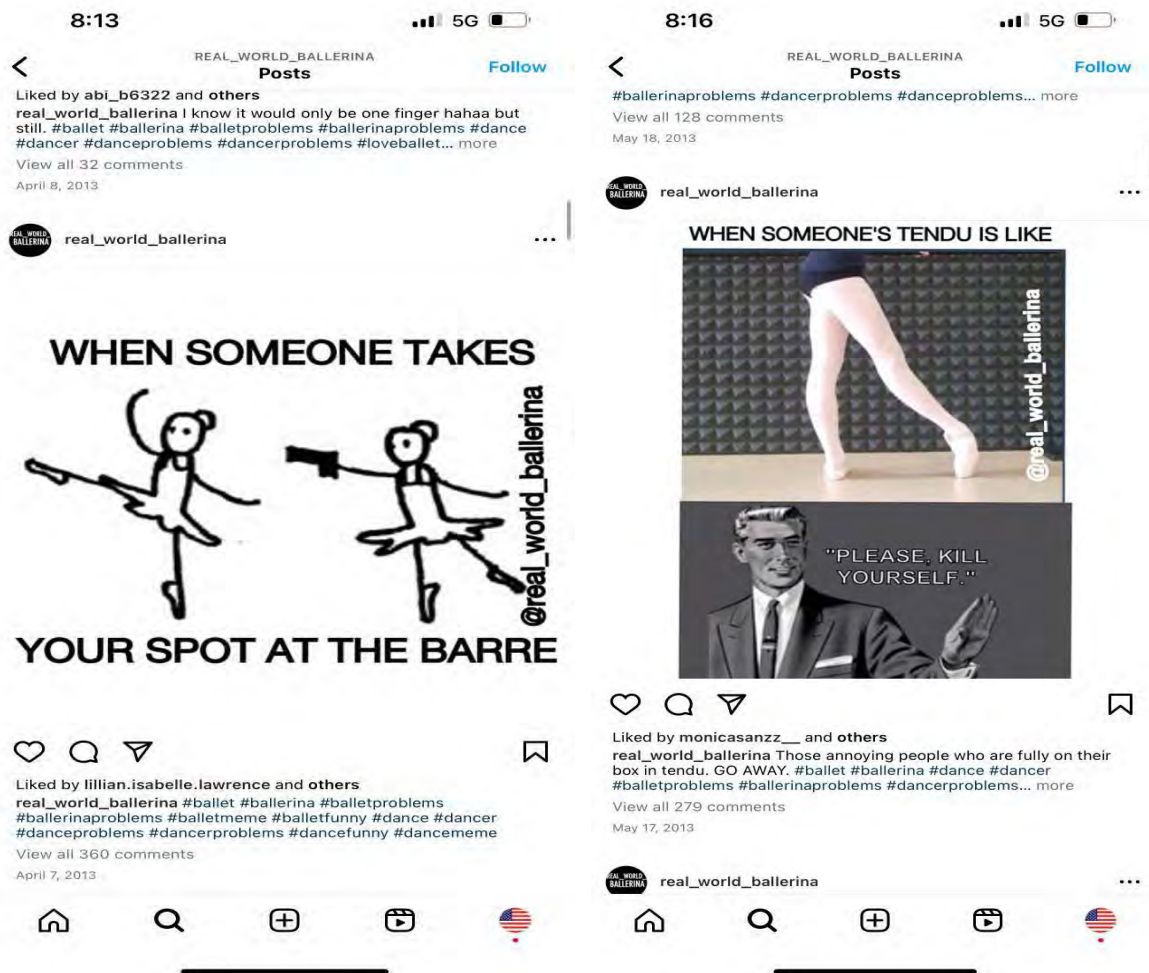
16 141. Ms. Breshears was spreading defamation by way of using her famous and  
17 high-profile dance community focused Instagram account @Real\_World\_Ballerina,  
18 anonymously, as she spent her days in law school, simultaneously and publicly  
19 mocking and shaming dancers and the community through misguided posts on her  
20 anonymous social media account.

21 142. For example, Defendants' account, @Real\_World\_Ballerina, consisted of  
22 harassing and threatening posts illustrated by Defendant, shooting another dancer out  
23 of spite and encouraging others to kill themselves because of how they look compared  
24 to other dancers.  
25  
26  
27  
28



143. These posts were used to intimidate anyone who followed this account and whose opinion differed from Ms. Breshears'.

144. This cyber bullying was only fortified when Defendant began posting about Plaintiffs on May 13<sup>th</sup>, 2021.



145. Madison Breshears has, in recent days, scrubbed the internet entirely of any statement she has ever made about Plaintiffs including deleting any and all defamatory posts about Plaintiffs on her Instagram page @Real\_World\_Ballerina, to make her account look as though she never posted those defamatory statements.

146. In the weeks following Defendants' defamatory post, Plaintiffs sought counsel in Nevada, (Marc Randazza of Randazza Legal Group), to initially help in discovering

who was behind the account @Real\_World\_Ballerina and additionally to file suit against the owner of the account for the defamatory posts and remarks however, on July 28<sup>th</sup>, 2021, Madison's best friend, Sage Humphries filed the lawsuit Madison was tasked to defamatorily prime before Plaintiffs could file their own against Madison Breshears; preventing them from taking action against her for her defamation.

147. As previously stated, and as a direct result of Madison Breshears' defamatory posts and remarks, Plaintiffs did not work or generate any revenue following the date of May 13<sup>th</sup>, 2021.

***The July 28<sup>th</sup>, 2021, Sage Humphries Litigation in Nevada District Court***

148. On July 28<sup>th</sup>, 2021, Sage Humphries and Gina Menichino, (represented by Sigrid McCawley and associates from Boies Schiller Flexner), filed a civil complaint against Plaintiff Taylor Button<sup>14</sup>.

149. Plaintiffs discovered through the front-page publishing of The New York Times that this complaint was filed, *prior* to Plaintiff Taylor Button even being served.

150. Plaintiff Dusty Button was *not named* as a Defendant in Ms. Humphries' and Ms. Menichino's complaint.

151. Plaintiff Dusty Button has never met Gina Menichino.

152. None of Defendants' defamatory posts specifically reference Plaintiff Taylor Button by name.

153. Instead, Ms. Breshears specifically names Dusty Button and only refers to Taylor Button as "her husband" in order to procure the attention of the dance

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<sup>14</sup> See Nevada District Court Case: 2:21-cv-01412-ART-EJY

1 community as a whole, a community that Plaintiff Taylor Button had absolutely no  
2 involvement in at this time.

3 154. Plaintiffs had already traumatically endured three months of harassment,  
4 bullying and threats, including total loss and destruction of Plaintiffs' businesses as  
5 any and all employment as well as official representation by agents, which was  
6 destroyed as a direct result of Madison Breshears' defamatory campaign.

7  
8 155. Defendant *intentionally* chose to use Plaintiff Dusty Button's name to target  
9 an industry plagued by the cancer that is Cancel Culture and Me-Too desperation, as  
10 she knew it would harm Plaintiffs in such a way, that it would destroy their lives, their  
11 businesses, and their careers, crippling their ability to litigate the lawsuit she knew was  
12 being filed.

13  
14 156. After Plaintiffs retained Randazza Legal Group, they were not even able to  
15 fight the defamatory remarks made by @Real\_World\_Ballerina, as Plaintiffs were  
16 instead, forced to defend against Sage Humphries' frivolous and fraudulent complaint  
17 as they could not pursue their own claims of defamation against Madison Breshears  
18 timely while defending against the false allegations of Sage Humphries at the same  
19 time and additionally lost any and all income to fund two defenses at the same time.

20  
21 157. Defendant intentionally plotted to destroy Plaintiffs ability to generate income  
22 for precisely that reason.

23 158. Sage Humphries, her parents Micah and Michael Humphries, non-party co-  
24 conspirator Hannah Stolrow and Madison Breshears *intentionally conspired* together  
25 to ruin Plaintiffs' lives, crippling Plaintiffs' ability to work as their reputations,  
26 careers, business and livelihood were completely destroyed.



159. Defendant knew there would be no consequence to her actions at the time, as Plaintiffs could not afford to pursue action against her even if every waking moment of their lives weren't spent defending their good names against the false claims Madison Breshears personally pushed to the cover of every major news publication on the planet and including because Plaintiffs did not know that it was Defendant who ran the anonymous account @Real\_World\_Ballerina at the time.

160. In the fall of 2021, Plaintiffs were evicted from their home due to their inability pay for their bills, thus accruing massive debt as a direct result of no income following Madison Breshears' defamatory posts and remarks leading up to Sage Humphries' fraudulent complaint and the global media campaign waged against Plaintiffs.

161. On September 23<sup>rd</sup>, 2021, Plaintiffs were met with an amended complaint by Sage Humphries' attorneys whereas, they added three other litigants – Plaintiff Taylor Button's ex-girlfriend from 2009, Danielle Gutierrez, another woman from the same dance studio in 2009, Rosie DeAngelo and a woman Plaintiffs have never met, known as Jane Doe <sup>15</sup>.

162. The allegations brought forth by all three are false in their entirety however, these three complaints prove Madison Breshears' defamation further as her defamatory statements about Plaintiffs are not supported by the allegations *even if* the

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<sup>15</sup> On May 27<sup>th</sup>, 2024 Madison Breshears admitted that she had never spoken to Jane Doe after lying and falsely stating she knew that Jane Doe spoke to the New York Times and would be published in the article which is entirely false as Gina Menichino and Sage Humphries were the only parties to have spoken to the New York Times. Ms. Breshears lied and made this statement to try and justify her defamatory statements made three months prior to the article being published; it does not work as her statements are undeniably proven to be false.

allegations were true, (they are not), *and even if* Madison Breshears knew of them prior to May 13<sup>th</sup>, 2021, (she did not).

163. Plaintiff Dusty Button has never met Danielle Gutierrez, Rosemarie DeAngelo and additionally, has never met or heard of Jane Doe 1.

164. Plaintiff Taylor Button has never met or heard of Jane Doe 1.

165. On December 13<sup>th</sup>, 2021, Plaintiffs were again, met with a second amended complaint by Sage Humphries' attorneys whereas, two more litigants were added; Plaintiff Taylor Button's [REDACTED], Jane Doe 2 and Juliet Doherty (who has now withdrawn and revoked her claims in their entirety).

166. The allegations brought forth by these two litigants are false in their entirety however, these two complaints prove Madison Breshears' defamation further as her defamatory statements about Plaintiffs are not supported by the allegations *even if* the allegations were true, (they are not), *and even if* Madison Breshears knew of them prior to May 13<sup>th</sup>, 2021, (she did not, now admitted by Madison Breshears herself on May 27<sup>th</sup>, 2024), as the conversation was as follows:

Plaintiff Taylor Button: "*Have you talked to anyone in this litigation aside from Sage?*"

Defendant: "*No.*"

167. Plaintiff Dusty Button has never met Jane Doe 2.

168. Plaintiff Juliet Doherty<sup>16</sup> voluntarily withdrew herself from the litigation after Taylor and Dusty Button proved her allegations to be fraudulent.

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<sup>16</sup> Defendants have filed a lawsuit against Juliet Doherty for sexual assault and malicious prosecution amongst other claims including claims against her mother and photographer for claims of conspiracy and defamation. See case 1:24-cv-05026-JPC filed in the Southern District Court of New York.

169. While none of the allegations in Nevada are true, none of the allegations brought forth in Nevada *even if they were true*, (they are not), validate Madison Breshears' defamatory statements rather, entirely invalidate Madison's publications and thus certifying they are defamatory, verifying that she did in fact know that her statements were false in their entirety.

170. Defendants' statements were made out of *actual malice*, in conspiracy with Sage Humphries to ruin Plaintiffs' lives prior to the onset of Sage Humphries' complaint being filed three months after Madison Breshears' defamatory statements about Plaintiffs were posted.

171. On May 27<sup>th</sup>, 2022, Sage Humphries provided an interview on Good Morning America following a setup by her infamous counsel, (who famously defended Harvey Weinstein and Theranos, which their leader David Boies was a board member of), whereas, the entirety of her interview was defamatory in and of itself.<sup>17</sup>

172. In July of 2022, Plaintiffs Dusty and Taylor Button filed a Motion to Dismiss and Counterclaim in Nevada, adding a third-party complaint against Sage Humphries' parents and three men whom Sage Humphries had inappropriate sexual relationships with, Daryl Katz<sup>18</sup> (billionaire and owner of the NHL team The Edmonton Oilers), Anthony Giovanni Deane (Sage's ex-boyfriend whom was more than two decades her senior) and Chase Finlay (whom Sage dated whilst he was engaged to another woman, thus destroying their engagement and their relationship in its entirety).

<sup>17</sup> <https://www.youtube.com/watch?app=desktop&v=rdUCjhVK2Qo> – Good Morning America, Interview with Sage Humphries

<sup>18</sup> <https://edmontonjournal.com/news/local-news/oilers-owner-daryl-katz-and-ballet-dancer-both-deny-allegations-they-had-sexual-relationship> - Edmonton Journal Article regarding Sage Humphries and Daryl Katz' relationship.

173. On the day Taylor and Dusty Button's counterclaim was filed, Sage Humphries was mid-interview with Gretchen Voss, Boston Magazine Journalist, whereas, everything Sage had ever said was disproven by the counterclaim and exhibits which corresponded.

174. Sage Humphries abruptly ended her interview with Gretchen Voss.

175. Upon belief, Defendant had knowledge of Ms. Humphries' sexual relationships with Anthony Giovanni Deane, Chase Finlay and Daryl Katz.

176. Sage Humphries' Boston Magazine interview<sup>19</sup> further proves that Madison Breshears knew her statements were defamatory but posted them anyway.

177. In August of 2022, after being physically and financially (legally) threatened by Daryl Katz and his hired "fixer", Anthony Pellicano<sup>20</sup>, against Plaintiffs' demands, Plaintiffs attorney withdrew Daryl Katz (with a tolling agreement) and the other two men from the third-party complaint leaving only Sage Humphries' parents.

178. In October of 2022, Plaintiffs lost their counsel due to the inability to continue funding their representation.

179. Since October 14<sup>th</sup>, 2022, Plaintiffs have been *pro se* against Boies Schiller Flexner and their six clients, one of whom Plaintiffs have never met or heard of, (Jane Doe 1) but all of which whom have admitted under oath that they were recruited by Humphries and Counsel and that their claims have no basis or grounds.

<sup>19</sup> <https://www.bostonmagazine.com/news/2022/08/02/ballet-scandal-boston/> - Boston Magazine Article about Sage Humphries and Plaintiffs Dusty and Taylor Button, August 2<sup>nd</sup>, 2022.

<sup>20</sup> <https://variety.com/2022/film/news/anthony-pellicano-daryl-katz-marc-randazza-1235349929/> ; <https://thenevadaindependent.com/article/pellicanos-presence-adds-a-new-twist-in-ballerina-sex-exploitation-litigation> ; <https://www.casino.org/news/mgm-wiretap-p-i-hired-to-disappear-billionaire-ballerina-sex-lawsuit/> ; articles regarding Daryl Katz hiring Anthony Pellicano to silence Plaintiffs Dusty and Taylor Button.

180. On February 2<sup>nd</sup>, 2023, the Nevada District Court held an Oral Argument on several pending motions including Plaintiffs' Counterclaim against Sage Humphries, which included supplemental exhibits including text messages between Sage Humphries and her mother regarding her mother's disapproval of her daughter's consensual dating relationship with Taylor and Dusty Button and a July 22<sup>nd</sup>, 2017 false police incident report filed by Sage Humphries' mother, countering Sage Humphries' allegations in addition to the defamation claims against her for her Good Morning America interview on May 27<sup>th</sup>, 2022.

181. Sage Humphries filed to dismiss Dusty and Taylor Button's counterclaim against her whereas, the Court DENIED her motion to dismiss the counterclaim of *defamation per se*, further proving Ms. Humphries allegations to be fraudulent and additionally, that Madison Breshears' posts were intentionally defamatory against Plaintiffs<sup>21</sup>.

182. On February 22<sup>nd</sup>, 2023, Plaintiffs filed a motion to vacate Sage Humphries' abuse prevention order which was granted in 2017, (which is currently scheduled for oral argument this fall on the grounds of fraud on the Court), in Boston, MA.

183. Plaintiffs' discovered evidence of fraud in the Nevada litigation proving Sage Humphries' fraud in 2017 and 2018 including false police reports and lying to law enforcement, which Plaintiffs were not aware of until the discovery of the Nevada litigation began but which she used to secure her abuse prevention order in 2017 and 2018.

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<sup>21</sup> On February 17<sup>th</sup>, 2023 Honorable Judge Traum entered an Order denying Sage Humphries' motion to dismiss Dusty and Taylor Button's defamation claim against her whereas the Court stated: "Based on the details herein and in lights of the record as a whole, the Court denies Sage Humphries' Motion to Dismiss the counterclaim of defamation per se."

184. On June 11<sup>th</sup>, 2023, Plaintiffs filed an appeal the decision to vacate Sage Humphries’ restraining order on the grounds of fraud on the Court in light of new evidence.

185. Plaintiffs appeal is scheduled for Oral Argument in the Massachusetts Appellate Court<sup>22</sup>.

186. On February 24<sup>th</sup>, 2023, Juliet Doherty voluntarily withdrew herself from the Nevada litigation.

187. In June of 2023, Plaintiffs filed a Rule 11 Motion for Sanctions against Jane Doe 1 and her counsel as they **have never met her in their entire lives** whereas, her complaint was “amended”, forcing a third amended complaint. This action resulted in Plaintiffs filing a new motion to dismiss and counterclaim against all parties which is still pending.

188. In September of 2023, Plaintiffs deposed Sage Humphries whereas, her admissions in her deposition prove she conspired with Madison Breshears to post defamatory remarks against Plaintiffs to gain attention and traction prior to the filing of her litigation in Nevada, crippling Plaintiffs’ ability to defend themselves.

***Madison Breshears’ relationship with Sage Humphries and her knowledge of Sage***

***Humphries’ consensual dating relationship with Plaintiffs***

189. Defendant is originally from California.

190. Defendant is friends with two women named in this Complaint; Sage Humphries and non-party co-conspirator, Hannah Stolrow whereas, all three grew up together in California and aspired to be professional ballerinas whereas, all but the

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<sup>22</sup> Docket number: 1202-P-2023 – Button v. Humphries

1 named Defendant in this complaint were successful in becoming professional  
2 ballerinas.

3 191. Plaintiff Dusty Button was one of the most prominent and world-renowned  
4 ballerinas including that she was Red Bull's first and only ballet athlete, endorsed and  
5 contracted by many brands due to her talent, marketing and branding as her own  
6 business.

7  
8 192. Plaintiff Taylor Button was one of the most prominent and world-renowned  
9 designers and builders in the automotive industry including the design and building of  
10 famed horological machines, Ferraris, race cars and military vehicles, contracted and  
11 endorsed by many brands due to his talent, marketing and branding as his own  
12 business.

13  
14 193. In 2012, Plaintiffs moved to Massachusetts as Dusty Button became a  
15 company member of the Boston Ballet.

16 194. In 2014, Dusty was promoted to Boston Ballet's highest position in the  
17 company as Principal ballerina.

18 195. In 2016, Sage Humphries, who was also a member of the Boston Ballet,  
19 introduced herself to Dusty Button at the Boston Ballet whereas, they became good  
20 friends.

21  
22 196. In 2017, Sage Humphries, (nearly twenty years old), infiltrated Plaintiffs'  
23 marriage, initiating a physical and sexual relationship with both Plaintiffs, ultimately  
24 forming an open dating relationship for about four months from May until July of  
25 2017, thus making Plaintiffs one of dozens of unconventional relationships that Sage  
26  
27  
28



Humphries created in her pursuit of freeing herself from the confines of an overcontrolling family.

197. Plaintiffs have never had interest, been involved in or interested in an open relationship prior to allowing Sage Humphries to infiltrate their marriage and would never again do so.

198. During Plaintiffs' relationship with Sage, she spoke highly of Plaintiffs to Madison Breshears (named Defendant in this Complaint) and Hannah Stolrow.

199. Ms. Stolrow was the first person Sage Humphries told she was "in love" with both Plaintiffs and additionally, told Ms. Breshears and Ms. Stolrow that she had "never been happier" than she was while in the relationship with Plaintiffs, to which Ms. Stolrow professed having witnessed these claims by Sage Humphries herself.

200. In April, 2017, Plaintiffs were invited to Ms. Humphries' parents' home in California for Easter and to celebrate Plaintiff Taylor Button's birthday which is April 16<sup>th</sup>.

201. On April 16<sup>th</sup>, 2017, Sage Humphries asked Plaintiffs if they wanted to sleep at her father's "law office" which doubled as a "beach house" in Seal Beach, CA – The Law Office of Michael Humphries.

202. On April 16<sup>th</sup>, 2017, Sage Humphries stated she had a "surprise" for Taylor's birthday, whereas, she initiated a three-way relationship that evening as a proverbial birthday gift for Plaintiffs Taylor Button and Dusty Button thus blurring the lines between friendship and relationship.

203. On the morning of April 17<sup>th</sup>, 2017, Sage's father walked in on the three, nude together in bed, and while making unbroken eye contact simply reminded Sage

1 Humphries of her dentist appointment that morning and left, later directing Plaintiffs  
2 where the best coffee place in town was and carried on for the rest of the trip as if  
3 nothing happened.

4  
5 204. Following the intimate interaction which took place on April 16<sup>th</sup>, 2017, Sage  
6 Humphries and Plaintiffs continued their relationship, ultimately labeling each other as  
7 “boyfriend” and “girlfriend” and spending most of their time together in a relationship  
8 as Sage Humphries asked Plaintiffs if she could stay at their apartment the majority of  
9 the time.

10 205. Ms. Humphries’ parents never addressed walking in on the three.

11 206. Following the April trip to California, Micah Humphries initiated a “group  
12 text” with her daughter and Plaintiffs which was regularly used.

13  
14 207. In May of 2017, Ms. Humphries’ parents again, invited Taylor Button to their  
15 home on two occasions while he was there for work, in which he obliged.

16 208. At the end of April, 2017, Ms. Humphries’ parents, (Micah and Michael  
17 Humphries), made it clear that they knew she was in a dating relationship with both  
18 Plaintiffs whereas, at first, Ms. Humphries’ parents accepted the relationship, asking if  
19 she could move in with Plaintiffs stating they knew Sage’s desire was to move in with  
20 them and wanted to make sure it was okay with Plaintiffs.

21  
22 209. In May of 2017, Micah Humphries visited Plaintiffs’ home in Massachusetts,  
23 staying over for one night during her visit.

24 210. In May of 2017, Sage’s parents sent the summer itinerary they planned for her,  
25 giving her dates in which, she was allowed to make her own plans for the summer,  
26 though she was an adult, whereas, Sage Humphries made it clear that she already  
27  
28

made plans with Plaintiffs to travel to Australia but would adjust her schedule to also fit in what her parents scheduled for her.

211. Upon Sage Humphries' statements to her mother regarding her summer schedule, there was a complete turn of events, as Sage Humphries was insistent on being allowed to make her own decisions including the text message between Sage and her mother which stated the following:

- **Micah Humphries:** "They are not your masters. I don't know what control. I'm pretty sure this is a threesome and I'm completely weirded out by all of it. You've known them 3 months. I love you sage but this situation is destructive to you and not healthy."
- **Sage Humphries:** 1) "Dusty is texting you regarding what you said about her to dr k. 2) you are paranoid and sound crazy regarding this relationship."
- **Micah Humphries:** "It is weird Sage".
- **Sage Humphries:** 3) "this is my choice".
- **Micah Humphries:** "Sage".
- **Sage Humphries:** "my life my summer".
- **Micah Humphries:** "I love you with all my heart".
- **Sage Humphries:** "Nobody is controlling my life. You are the only person trying to do so".

212. Following this argument between Sage and her mother, it was then made clear (in a turn of events), that her parents suddenly did not approve of her decision to be in an open dating relationship with Plaintiffs.

1       213.       On May 17<sup>th</sup>, 2017, Micah Humphries texted her daughter, warning her that if  
2       she did not end the relationship with Plaintiffs, she would fly to Boston from  
3       California with her husband and forcibly remove Sage.

4       214.       Sage Humphries ignored her mother's message regarding coming to get her  
5       things and instead, continued her relationship with Plaintiffs as she expressed that was  
6       her desire.

7  
8       215.       On May 22<sup>nd</sup>, 2017, to Plaintiffs' shock, Plaintiff Dusty Button's contract with  
9       the Boston Ballet was abruptly terminated for "just cause", with no explanation as to  
10      why she was terminated, banning Dusty and Taylor from the Boston Ballet building as  
11      well as the Boston Opera House where the performances were held and in fact, would  
12      not allow Dusty to collect her belongings from Boston Ballet.

13  
14      216.       Upon belief, Madison Breshears had *actual knowledge* that Sage Humphries'  
15      parents were directly responsible for the termination of Plaintiff Dusty Button's  
16      contract with the Boston Ballet due to defamatory statements including by stating that  
17      Plaintiffs had over fifty automatic weapons, hand grenades and land mines in their  
18      apartment, which they later filed a false police report about.

19  
20      217.       Dusty Button has never received a reason or cause for her termination from  
21      Boston Ballet nor was one named in the official documentation however, Plaintiffs  
22      now know, Micah and Michael Humphries conspired with Boston Ballet to  
23      prematurely terminate Dusty Button's contract.

24      218.       On May 24<sup>th</sup>, 2017, Sage Humphries' parents sent her a text that they were in  
25      Massachusetts, ordering her to attend dinner and falsifying that Ms. Humphries'  
26      grandfather was "dying". He was not.

219. On May 25<sup>th</sup>, 2017, Sage Humphries, (who was an adult), went to dinner with Plaintiffs prior to her performance with Boston Ballet.

220. Upon Sage Humphries arrival to the Boston Opera House, she was escorted out of the Opera House by Boston Ballet staff and forcibly removed by her own parents who were waiting at the Opera House.

221. Sage Humphries called Plaintiffs screaming for help as she was forced by her parents into a taxi, through the airport and onto a plane, taken back to California to the Humphries' home to be "converted".

222. Madison Breshears had *actual knowledge* of Sage Humphries' kidnapping including because Ms. Breshears admitted to the following on the May 27<sup>th</sup>, 2024 phone call with Plaintiffs:

- Plaintiff: *"How did you know this?"*
- Defendant: *"From Hannah."*
- Defendant: *"I wanna make it clear, I don't want to throw Hannah under the bus"*
- Plaintiff: *"She's under that bus."*
- Defendant: *"I don't want to be involved in this at all."*
- Defendant: *"I don't want her to be involved in this at all."*

And;

- Plaintiff: *"Have you talked to anyone in this litigation aside from Sage?"*
- Defendant: *"No."*

223. These statements are confirmation that Ms. Breshears knew her statements to be false and defamatory prior to making them including direct information and knowledge from Sage Humphries herself and their mutual best friend and non-party

co-conspirator Hannah Stolrow including actual knowledge of the relationship between Sage Humphries, who was an adult, and Plaintiffs in 2017.

224. Micah and Michael Humphries (admittedly) stripped their daughter's drivers' license, cell phone and keys to prevent her from leaving their home or contacting Plaintiffs or any other third party for help as they forced her into therapy that they funded with her own money that they stole from her bank account without permission.

225. Madison Breshears had actual knowledge Sage Humphries' forced therapy and lack of freedom while at her parents' home in California.

226. On or around May 26<sup>th</sup>, 2017, Plaintiffs contacted Hannah Stolrow to ask if she heard from Sage Humphries and explained the events that had taken place to which Ms. Stolrow responded "Oh my God, Micah is doing it again".

227. Ms. Stolrow stated to Plaintiffs that it is Micah Humphries' *modus operandi* to control and manipulate any and all relationships Sage pursued on her own and which were not approved by her mother, whether it be a friendship or dating relationship.

228. On May 26<sup>th</sup>, 2017, Ms. Stolrow stated she had not heard from Ms. Humphries in some time, was worried and volunteered to check on her as she was in close proximity to Ms. Humphries' parents' home in Seal Beach, CA.

229. Madison Breshears had *actual knowledge* of Ms. Stolrow checking on Sage Humphries, who was confronted by Micah Humphries and not allowed to speak to Sage who was in captivity at that time.

230. Upon Ms. Stolrow driving to Ms. Humphries' parents' home to visit and check on her, the Humphries stopped Ms. Stolrow from speaking to Sage and instead lied to Ms. Stolrow telling her an entirely fabricated narrative consisting of lies about

1 Plaintiffs drugging their daughter, raping her, preventing her from communicating  
2 with her parents and controlling her communications, including her emails and social  
3 media.

4  
5 231. Hours after checking in on Ms. Humphries, Ms. Stolrow again, contacted  
6 Plaintiffs with an entirely different approach, yelling at Plaintiffs that they lied to her  
7 and did not “tell her the whole truth”.

8 232. Plaintiffs never understood what Ms. Stolrow was referring to until they were  
9 provided text messages from Ms. Stolrow to Sage Humphries’ mother in 2023 and  
10 until they spoke to Ms. Stolrow’s ex-boyfriend, (Bryce Jackson Lee), on October 3<sup>rd</sup>,  
11 2023, whereas, Bryce confirmed that Sage Humphries’ mother lied to Ms. Stolrow  
12 stating her daughter was drugged by Plaintiffs and was recovering from trauma  
13 suffered by the hands of Plaintiffs.

14  
15 233. Sage Humphries was deposed in September of 2023 whereas, she stated she  
16 never spoke to Ms. Stolrow that day as she was not allowed to leave the house but that  
17 her mother spoke to Ms. Stolrow instead.

18 234. On May 27<sup>th</sup>, 2017, Sage Humphries’ parents sent a text message to Plaintiffs  
19 threatening them with restraining orders.

20 “Restraining Orders are being filed”.

21  
22 235. Simultaneously, and unbeknownst to Ms. Humphries’ parents, she was using  
23 their phones to message Plaintiffs, which she pursued on her own, begging Plaintiffs  
24 for help to, “come save her”, “come get her” and “need help”.

25 236. On May 28<sup>th</sup>, 2017, Sage Humphries’ father filed two false police reports, one  
26 in California and one in Massachusetts.



237. Sage Humphries tried to escape his home in California whereas the police were called for a family disturbance.

238. Michael Humphries told the police his daughter's ex-boyfriend, (Plaintiff Taylor Button), boarded a flight, was coming to kidnap her and take her back to Boston, that Plaintiffs were going to harm Sage and her family.

239. Sage Humphries told the police that there was no validity to her fathers' statements to the police and she felt safe, as seen in the report below:

9/13/2023		Orange County Sheriff Department				11:33:44AM	
Call Detail Information Report							
Call Number: 170528-0691							

Call Number		170528-0691					
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Call Detail Information							
Call Number	Class	Taker	Pos	Call Owner	Date - Time Received	Cal	
170528-0691	G	ROSECL	10		05/26/2017 18:28:29	0	
Complaint		Ten Code	Priority	Ons Zone	IRA	How Received	
415F DISTURBANCE-FAMILY DISPUTE			2	NO	RO01	WIRE	
Incident Location		App/Unit	Floor/Bldg	Incident City	Grid		
11340 WEMBLEY RD				RO	796H3		
Caller Name		Patrol Zone	Telephone	Tower ID	Jurisdiction	Tract	
HUMPHRIES, MICHAEL		06	562-756-2693	949-511-0580	OCSO	RO	
<input type="checkbox"/> Inmate <input type="checkbox"/> Medical <input type="checkbox"/> Hazard <input checked="" type="checkbox"/> Previous <input type="checkbox"/> OR Issued in Error							
All Time	Call Rec'd	Kmit	Dispatch	Enroute	OnScene	Departed	Arrived
18:28:18	18:28:29	18:30:36	18:30:50	18:30:50	18:46:04		19:20:26
<b>Narrative</b> [05/26/2017 19:20:25 : pos2 : chano] [Cleared with unit 4A08]  [05/26/2017 19:19:37 : MOB : 4A08] Spoke with informant who stated daughters ex boyfriend boarded a flight from boston to his home. informant believes his daughter is going to be taken from his home and taken back to boston. spoke with daughter sage who stated there is no validity to the statements made by her father. Sage feels safe and there will be no harm done to her family. sage agreed to travel to Sacramento to visit family. no crime committed. 10-98  [05/26/2017 19:13:52 : pos2 : chano] Unit : 4A08 C4  [05/26/2017 19:05:17 : pos2 : chano] Unit : 4A08 10-6  [05/26/2017 18:48:26 : pos2 : chano] Unit : 4A08 HAVE CONTACT  [05/26/2017 18:30:36 : pos10 : ROSECL] Cross streets: SHAKESPEARE DR/CHESNEY DR NBH: 796H3 90720 33.7986273663148,-118.061774826051 INF VS 19 YO DTR IN A 415V INF IS UPSET THAT DTRS FRIENDS FROM BOSTON ARE POSS ENRTE TO THE HOUSE FROM BOSTON PER INF THEY POSS BOARDED A PLANE 6 HRS AGO  <b>Location Comment</b> NBH: 796H3 90720 33.7986273663148,-118.061774826051							

Call Dispositions		
Date - Time	Disposition	Unit
05/26/2017 19:19:48	Assist	4A08
05/26/2017 19:20:25	No Report Needed	4A08

1 240. Exactly one minute after the false report was filed in California, Ms.  
2 Humphries' parents called in a false 911 call using an address of Plaintiffs' former co-  
3 worker in Somerville, MA falsely stating Plaintiffs had over fifty assault rifles, hand  
4 grenades and land mines in their apartment resulting in the Department raiding  
5 Plaintiffs' apartment, in which it was cleared in approximately five minutes as no such  
6 items were ever owned or possessed by Plaintiffs.  
7

8 241. Madison Breshears had *actual knowledge* of these two incidents whereas,  
9 Defendant had *actual knowledge* of these false reports to the police made by Sage  
10 Humphries' parents in an attempt to destroy Plaintiffs' lives due to their daughter's  
11 relationship with them including because she spoke to Sage Humphries and Hannah  
12 Stolrow regarding the events which took place in the summer of 2017.  
13

14 242. From June 1<sup>st</sup> until July 18<sup>th</sup>, 2017, Sage Humphries continued to pursue  
15 Plaintiffs, (who were in Australia), via Snapchat using her younger brothers' phone  
16 and at times, stranger's phones, begging Plaintiffs to "save her" and to "come get  
17 [her]", that her parents were performing exorcisms on her, had kidnapped her and she  
18 was being forced into therapy.  
19

20 243. Defendant had *actual knowledge* that Sage Humphries was using various  
21 phones and messaging apps to contact Plaintiffs against her parents' orders, as her  
22 desire was to continue her relationship with Plaintiffs.  
23

24 244. Ms. Humphries hid her relationship and contact with Plaintiffs from her  
25 parents.  
26

27 245. Plaintiffs never once reached out to Ms. Humphries after May 25<sup>th</sup>, 2017.  
28

1       246. Defendant had actual knowledge that Sage Humphries hid her relationship and  
2       contact with Plaintiffs from her parents.

3       247. Ms. Humphries communicated with Hannah Stolrow and Madison Breshears  
4       in the months of June and July of 2017 about Plaintiffs, including using Ms. Stolrow's  
5       cell phone to contact Plaintiffs and additionally, travelling to Ms. Stolrow's house in  
6       the summer of 2017, once her parents gave her permission to do so.

7  
8       248. In July of 2017, Ms. Humphries' parents gave her an ultimatum; to either end  
9       her dating relationship with Plaintiffs or she would lose everything she ever loved,  
10       including that they would not pay for her ticket to go back to Massachusetts to rejoin  
11       the Boston Ballet in August of 2017.

12       249. Defendant had actual knowledge of Sage Humphries' ultimatum, to choose her  
13       career at Boston Ballet or her relationship with Plaintiffs.

14  
15       250. On July 10<sup>th</sup>, 2017, Ms. Humphries warned Plaintiffs of her parents' ultimatum  
16       whereas, she additionally warned Plaintiffs that she would leave a fake breakup  
17       voicemail on their phones in order to make her parents believe she ended the  
18       relationship, allowing her to go back to Boston but insisted she wanted to continue the  
19       relationship when back in Boston; she just needed to "make her parents think she was  
20       ending it".

21  
22       251. Defendant had actual knowledge of Sage Humphries' "fake break up" with  
23       Plaintiffs.

24       252. On July 14<sup>th</sup>, 2017, Ms. Humphries contacted Plaintiffs and stated her parents  
25       were forcing her to see a lawyer, that she got really upset and left and stating to  
26  
27  
28

1 Plaintiffs that her parents were forcing her to sign restraining orders against Plaintiffs  
2 or they would not give her back her freedom.

3 253. Sage Humphries did not fill out the restraining order application form, her  
4 parents did, forcing Sage Humphries to sign what they had written.

5 254. This forgery has since been admitted by Sage Humphries per her deposition in  
6 September of 2023.

7 255. Madison Breshears had actual knowledge that Sage Humphries was forced to  
8 sign the restraining orders her parents wrote and that it was against the wishes of her  
9 best friend.

10 256. Defendant had actual knowledge of Sage Humphries' being forced to see a  
11 lawyer and to sign restraining orders against Plaintiffs to regain her freedom, allowing  
12 her to go back to Boston, MA.

13 257. Defendant had actual knowledge that Sage Humphries' desire was to continue  
14 her relationship with Plaintiffs once she was back in Boston, but that she just needed  
15 her parents to "back off".

16 258. On July 18<sup>th</sup>, 2017, Ms. Humphries succumbed to her parents' pressure when  
17 her parents admittedly messaged Plaintiffs from her account thus ending her  
18 relationship with Plaintiffs.

19 259. On July 22<sup>nd</sup>, 2017, Sage Humphries' filed a false police report with the  
20 Orange County Police Department contradicting her prior statements to the police in  
21 May in order to have a record that she filed a report in preparation for her restraining  
22 order hearing.

260. The police noted they had previously been called to her parents' home on numerous occasions for the same matter whereas, every report was unfounded, as shown below:

12/17/2020		Orange County Sheriff Department				11:21:18AM	
Call Detail Information Report							
Call Number: 170722-0273							

Call Number	170722-0273						
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Call Detail Information							
Call Number	Class	Taker	Pos	Call Owner	Date - Time Received	Cat	
170722-0273	C	CEValdivia	12		07/22/2017 11:21:32	0	
Complaint	Ten Code	Priority	Disp Zone	IRA	How Received		
422R CRIMINAL THREATS REPORT		3	NO	RO01			
Incident Location	Apt/Suite	Floor/Bldg	Incident City	Grid			
11340 WEMBLEY RD			RO	796H3			
Caller Name	Patrol Zone	Telephone	Tower ID	Jurisdiction	Tract		
HUMPHRIES, SAGE	06	714-287-2693	-	OCSD	RO		
<input type="checkbox"/> Images	<input type="checkbox"/> Medical	<input type="checkbox"/> Hazard	<input checked="" type="checkbox"/> Previous	<input type="checkbox"/> DR Issued in Error			
ALL Time	Call Rec'd	Xmit	Dispatch	Enroute	OnScene	Departed	Arrived
	11:21:32	11:22:59	11:23:59	11:23:59	12:27:09		
							14:57:52
							1a06

Narrative
<p>[07/22/2017 14:57:52 : pos 1 : HixsonC] [Cleared with unit 1A06]</p> <p>[07/22/2017 14:57:00 : MOB : 1a06] OTHER DEPUTIES HAVE BEEN DISPATCHED TO THE HOUSE REFERENCE SIMILAR CALLS AND THE CALLS WERE UNFOUNDED.</p> <p>[07/22/2017 14:54:54 : MOB : 1a06] INF STATES HER DAD ALLOWS HER TO USE THE PHONE BY PERMISSION ONLY, AND HAS SAVED ALL COMMUNICATIONS ON TE PHONE. INF IS WILLINGLY COMMUNICATING WITH THEM ON HER BROTHERS PHONE WHEN SHE DOES NOT HAVE HER DADS PHONE.</p> <p>[07/22/2017 14:52:19 : MOB : 1a06] WHEN SHE RETURNS TO BOSTON. SHE HAS BEEN IN CONSTANT COMMUNICATION WITH THE COUPLE WHILE HERE IN ROSSMOOR. SHE ALLOWED ME TO VIEW HER TEXT MESSAGES WITH THEM AND THE MESSAGES WERE INCONSISTANT WITH THE STATEMENTS SHE MADE IN THE INTERVIEW. THE INF IS 19, IMPRESSIONABLE, AND WAS ABLE TO WALK AWAY OR LEAVE THE RELATIONSHIP AT ANY TIME AND CHOSE TO STAY IN IT. TE CRIMES WERE UNFOUNDED AND THE FATHER STATED THEY ARE IN THE PROCESS OF ATTEMPTING TO OBTAIN RESTRAINING ORDERS IN BOSTON.</p> <p>[07/22/2017 14:48:22 : MOB : 1a06] FATHER STATED HE CONTACTED BOSTON PD A COUPLE OF MONTHS AGO TO RELAY THE INFORMATION AND THEY ADVISED HIM WHEN THEIR DAUGHTER IS READY TO SPEAK WITH THEM, THEY WILL LOOK INTO IT. INF IS RETURNING TO BOSTON IN A COUPLE OF WEEKS FOR WORK AND WAS PLANNING ON TELLING BOSTON PD ABOUT THE RELATIONSHIP.</p> <p>[07/22/2017 14:47:11 : MOB : 1a06] THE 422 WAS UNFOUNDED BASED ON THE INTERVIEW. THE STATEMENTS MADE ON SNAPCHAT WERE INTERPRETED AS SEXUAL IN NATURE AND NOT IMPLIED TO MEAN GREAT BODILY INJURY OR DEATH. THE SEXUAL RELATIONS INCLUDED 'BONDAGE' TYPE ROLE PLAYING AND SHE BELIEVED THE STATEMENT WAS REFERENCE TO 'BONDAGE'</p> <p>[07/22/2017 14:45:38 : MOB : 1a06] CONTACTED INF WHO STATED SHE IS A BALLET DANCER IN BOSTON WHO BEFRIENDED A COUPLE ( MITCHELL TAYLOR MOORE AND DUSTY RACHEL BUTTON) ASSOCIATED WITH THE DANCE COMPANY SHE WORKED FOR. SHE WILLINGLY STAYED AT THERE APARTMENT MOST OF THE TIME, CONSENTED TO ENGAGING IN AN OPEN ROMANTIC RELATIONSHIP WITH THEM, HAD CONSENSUAL INTIMATE RELATIONS WITH THEM FOR A FEW MONTHS. 261 WAS UNFOUNDED BASED ON THE INTERVIEW.</p>

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261. Defendant had actual knowledge of Sage Humphries false reports to the police in order to appease her parents in following through with the fraudulent restraining order.

1 262. Plaintiffs were never aware of these reports filed until 2022.

2 263. On August 1<sup>st</sup>, 2017, Ms. Humphries filed her application for a temporary  
3 restraining order against Plaintiffs in Boston, Massachusetts.

4 264. Defendant had actual knowledge of Sage Humphries' fraudulent filing of a  
5 restraining order.

6 265. On August 14<sup>th</sup>, 2017, Ms. Humphries was granted a one-year restraining order  
7 against Plaintiffs.

8 266. Sage Humphries perjured herself in Court that day and committed fraud upon  
9 the Court to ensure her restraining order was granted.

10 267. Sage Humphries omitted every police report in her hearing in order to state she  
11 "filed" police reports against Plaintiffs but failed to bring the actual reports proving all  
12 of her statements and her parents' statements to the police were unfounded.

13 268. Sage Humphries has since been deposed, in 2023, whereas, she admitted her  
14 restraining order was actually to prevent Plaintiffs from "blackmailing" her, as she  
15 previously uploaded a camera roll from her iPhone in 2017 to Plaintiffs hard drive  
16 upon request, in order to send her old phone back when upgrading phones.

17 269. Plaintiffs were not aware that she left a camera roll on their hard drive in 2017.

18 270. Upon belief, Madison Breshears later became aware that Sage Humphries had  
19 left her camera roll on Plaintiffs hard drive.

20 271. The camera roll Ms. Humphries uploaded in 2017 consisted of [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28

[REDACTED]

[REDACTED].

272. Sage Humphries told Plaintiffs this relationship with Katz began when she was seventeen.

273. Upon belief, Madison Breshears had actual knowledge of the relationship between Katz and Sage Humphries as her best friend, Hannah Stolrow was also invited to dinner with Daryl Katz and Sage Humphries as a double date, to meet his cousin, Michael Gelmon<sup>23</sup>.

274. Defendant had actual knowledge of Sage Humphries' plan to conspire against Plaintiffs while appeasing her parents' orders.

275. Sage Humphries' father is an attorney, who abused his power by falsifying documents and forcing his daughter to sign them by way of threat and intimidation.

276. Sage Humphries' father abused his power to ensure his daughter's restraining order was granted as the Judge did not look at any evidence against Sage Humphries or her parents provided by Plaintiffs that day.

277. In 2018, on June 11<sup>th</sup>, Sage Humphries filed another false police report in Massachusetts against Plaintiffs, falsely stating Plaintiffs were selling illegal firearms in California.

278. This report was unfounded by police.

279. Defendant had actual knowledge of the false allegations contained in the false police report filed by Sage Humphries against Plaintiffs.

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<sup>23</sup> Article regarding Daryl Katz and Michael Gelmon - <https://www.cbc.ca/news/canada/edmonton/daryl-katz-greice-santo-dismiss-1.4070860>



1 280. On August 14<sup>th</sup>, 2018, the night before Ms. Humphries restraining order  
2 renewal hearing, Sage Humphries filed another false police report in Massachusetts  
3 claiming Plaintiffs were using a third-party to stalk her.

4 281. This report was unfounded by police.

5 282. Defendant had actual knowledge of the allegations within the false police  
6 report filed by Sage Humphries against Plaintiffs.

7 283. On August 15<sup>th</sup>, 2018, the Court held an ex-parte hearing whereas, Ms.  
8 Humphries was granted a permanent restraining order against Plaintiffs.

9 284. Sage Humphries used the false statements she reported to police in Court but  
10 neglected to bring the actual reports which showed her allegations were all false  
11 unfounded, which Plaintiffs were never aware of until 2022.

12 285. Upon belief, Defendant had actual knowledge of Sage Humphries' false  
13 statements to the Court, assuring her restraining order was made permanent and that  
14 Plaintiffs were not present, (as they were unaware of the hearing).

15 286. Ms. Humphries told Ms. Stolrow and Ms. Breshears of her consensual dating  
16 relationship with Plaintiffs, her parents' extreme disapproval, her desire to stay in the  
17 relationship with Plaintiffs and the love she had for Plaintiffs.

18 287. Ms. Breshears was an admirer, fan and follower of Plaintiff Dusty Button  
19 whereas, she had actual knowledge of the events which took place surrounding Sage  
20 Humphries' relationship with Plaintiffs as Dusty and Taylor posted numerous  
21 photographs and videos of the relationship on their public accounts.

1 288. Defendant had actual knowledge that Ms. Humphries' continued to appease  
2 her parents to assure her freedom was not taken away, while making false and  
3 defamatory allegations against Plaintiffs.

4 289. Defendant had actual knowledge that Sage Humphries **was an adult** at the  
5 time of her consensual dating relationship with Plaintiffs.

6 290. Defendant had actual knowledge that Sage Humphries' parents did not approve  
7 of Sage Humphries' choice to be in a dating relationship with Plaintiffs.

8 291. Defendant had actual knowledge of Sage Humphries' parents flying to  
9 Massachusetts from California to forcibly kidnap and traffic their daughter back to  
10 California against her will she made the decision to stay in the relationship with  
11 Plaintiffs.

12 292. Defendant had actual knowledge of Sage Humphries' desire to stay in the  
13 relationship with Plaintiffs and that her parents gave her an ultimatum in the summer  
14 of 2017 forcing her to choose between them and her own freedom.

15 293. Defendant had actual knowledge of the context of Sage Humphries' messages  
16 and communications to Plaintiffs during the time she was not "allowed" to  
17 communicate with them and did so in secret from her parents.

18 294. Defendant had knowledge of Sage Humphries' parents' threats to their  
19 daughter to either end the relationship with Plaintiffs or they would not give her the  
20 freedom to go back to Boston and return to her career at Boston Ballet.

21 295. Defendant had knowledge that Sage Humphries was forced to sign a  
22 restraining order against her will in order for her parents to allow her to go back to  
23 Boston, MA in the summer of 2017.

1       296. Defendant had actual knowledge of the nature of her friend’s relationship with  
2       Plaintiffs, as well as the events described herein *prior to making her defamatory*  
3       *statements* online accusing Plaintiffs of heinous acts with children and young dancers,  
4       which never occurred.

5       297. Defendant knew that the defamatory statements she made from her anonymous  
6       account @Real\_World\_Ballerina, were malicious as she intentionally inflicted harm  
7       upon Plaintiffs, including because Sage Humphries was an adult at the time of her  
8       relationship with Plaintiffs.

9       298. Defendant knew that the defamatory statements she made from her anonymous  
10       account @Real\_World\_Ballerina, were malicious as she intentionally inflicted harm  
11       upon Plaintiffs, including because Sage Humphries initiated an open relationship with  
12       Plaintiffs in which she communicated with Ms. Breshears, her desire to be with  
13       Plaintiffs and the love she had for them.

14       299. Given Defendants’ knowledge of the actual relationship between Sage  
15       Humphries’ and Plaintiffs, her repeated statements that Plaintiffs “groomed young  
16       girls” for “sex acts” with each other, that she “had evidence”, that it “was true” and for  
17       everyone to “keep an eye out”, that Plaintiff could not “keep a ballet job” while stating  
18       Plaintiffs’ prey on “young girls”, are defamatory statements made with actual malice,  
19       which destroyed Plaintiffs’ business and any chance of recovering from the damage  
20       which was immediately done to their careers and reputations.

21       300. Madison Breshears’ role in the destruction of Plaintiffs’ lives was fueled by its  
22       purpose and this purpose was to publicly destroy Plaintiffs’ lives and careers rendering  
23       them public pariahs.

1       301.       The importance of Defendants' role in this destruction was to eliminate  
2       Plaintiffs' ability to work, thus assuring that they would be incapable of funding a  
3       defense against Sage Humphries' frivolous and malicious lawsuit filed against  
4       Plaintiffs with the singular purpose of forcing Plaintiffs to destroy evidence that  
5       federally incriminates that friend, ( Sage Humphries ) and one of the wealthiest and  
6       most prominent men in the country Daryl Katz, (owner of the Edmonton Oilers NHL  
7       team), for illegal prostitution [REDACTED]  
8       [REDACTED]  
9       [REDACTED]  
10       [REDACTED]

11       302.       This evidence of Humphries' and Katz behavior, that the Boston Municipal  
12       Court has ruled was the rightful property of Plaintiffs has been the key focus of Ms.  
13       Humphries' fraudulent lawsuit, though the majority is sealed from the public, as all  
14       parties involved in the Nevada litigation, (aside from Dusty and Taylor Button) have  
15       fought, perjured themselves and manipulated the Court in the hopes of forcing the  
16       Court to order the destruction of this evidence that will eventually lead to criminal  
17       charges against the parties it is relative to.  
18

19       303.       Plaintiffs are merely collateral damage in Madison Breshears' role of  
20       destruction while assisting her friend as Sage Humphries covered the tracks of her  
21       illegal sexual proclivities.  
22

23       304.       Mr. Katz, a former third-party, (with a tolling agreement), Defendant in the  
24       Nevada litigation named above, has abused his wealth and power by hiring a  
25       convicted felon to threaten the lives of Plaintiffs while ordering their silence and like  
26       Katz, the corruption and illegal activity of his hired "gun" Anthony Pellicano runs  
27  
28

1 deep and that activity has placed them both in various Courts and various headlines  
2 over the decades.

3 305. While the reasons behind Madison Breshears' defamation remain entirely  
4 irrelevant, considering that her public shaming and abuse are now and always have  
5 been false and malicious in their entirety, the depths of the illegal and corrupt  
6 connections may illuminate the arrogance required to perform these acts, arrogance  
7 that stems from law school and the misguided feelings of immunity that come from  
8 attacking innocent people, at the pinnacle of their careers, while knowing they would  
9 be financially ruined and incapable of defending against the defamation of a powerful  
10 attorney, backed by one of the most powerful men in the country.

11 306. Illegal prostitution, abuse of power, sex trafficking and spoliation of evidence  
12 aside...Defendant maliciously and aggressively defamed Plaintiffs and destroyed any  
13 glimmer of a future they could hope for and did so with zero remorse and a proverbial  
14 middle finger to anyone who questioned her authority in the matter.

15 307. While the discovery process will tell all, it is telling that Defendant has erased  
16 and scrubbed the internet entirely of any and every comment that she has ever made  
17 about Defendants and more so, has erased any record of comments made to her  
18 regarding her previous defamatory claims.

19 ***Madison Breshears Continued Abuse of Power and Harassment Toward Plaintiffs***

20 308. On May 13<sup>th</sup>, 2024, Plaintiffs filed a complaint against Madison Breshears.  
21 Following the filing of the Complaint and to confirm Defendants' information for  
22 service of that complaint, Plaintiffs sent a text message and email to Ms. Breshears in  
23  
24  
25  
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hopes of getting confirmation of her contact information for the process server  
 whereas, the messages read:

- “*Madison, happy three year anniversary. May the odds be ever in your favor.*”
- The text message contained a photo of Madison Breshears’ “anonymous”, defamatory post on Instagram from May 13<sup>th</sup>, 2021 which stated: “*PSA: Dusty Button is a predator*”.

**Ms. Breshears replied:**

- “*If you still have a lawyer at this point, I’d consider running any further late night mafioso-style test blasts by him/her first :).*”

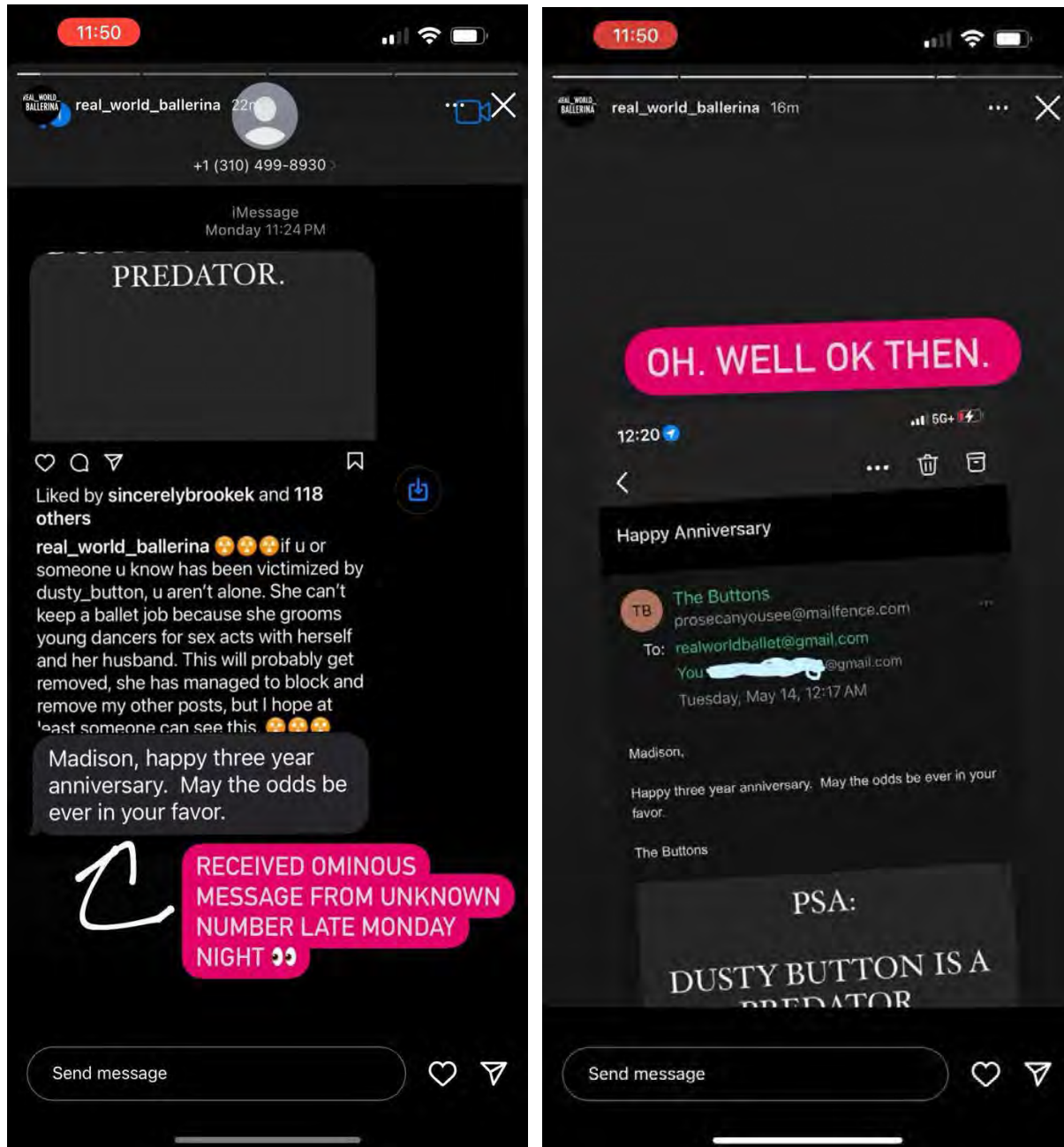
309. Plaintiffs did not reply but received another text from Ms. Breshears which stated, “*cool ‘hunger games’ reference, very millennial-coded, fittingly dated [salute emoji]*”. Again, Plaintiffs did not reply but confirmed to the process server that the phone number was indeed, Ms. Breshears’ which later came to use as Ms. Breshears moved addresses and was contacted by the server via telephone.

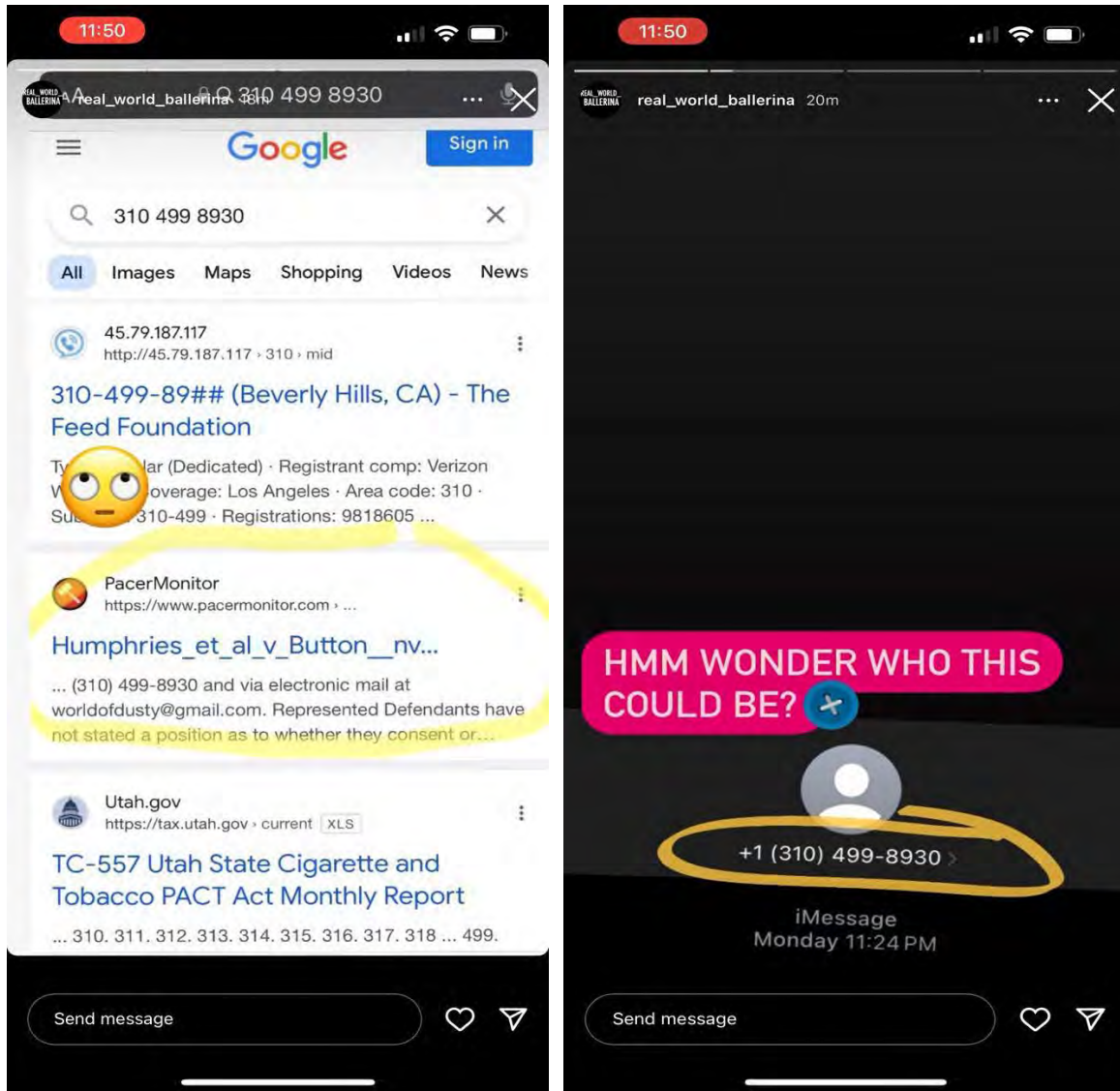
310. Shockingly, on May 14<sup>th</sup>, 2024, Defendant Breshears showed that after three years, she could still not contain her desperation for attention and rather than keeping the conversation between the private parties, immediately posted the text messages and content to the same “anonymous” Instagram account, @Real\_world\_ballerina, which is the very primary subject in which this instant dispute and litigation is regarding.

311. Ms. Breshears proceeded to post further false and defamatory statements about Plaintiffs, posting the original false, defamatory and egregious statement, “*Dusty Button is a predator*”, while doxing Plaintiffs’ private information to her account



including their telephone numbers and email address to nearly twenty-thousand followers via her (self-admittedly owned) social media account. The following posts were made on the account @Real\_world\_ballerina on May 14<sup>th</sup>, 2024:





312. Defendant intentionally and willfully doxed Plaintiffs private and personal contact information to *twenty-thousand* followers, with the intent to cause the very same harassment and cyber bullying which came from her false, defamatory and egregious conduct in May of 2021 by pointing those followers directly to Plaintiffs' phone number and email address instead of handling matters privately between the parties.

313. It is unacceptable for any party to conduct themselves in such a manner however, as Ms. Breshears is a licensed attorney, it is expected that she is not only aware but follows the Model Rules of Procedure which in this case, she did not.

314. Following Ms. Breshears' misconduct, Plaintiffs received messages and calls from unknown parties which were harassing and, in some cases, threatening, as a direct result of the Defendants' posts which were left on her Instagram for twenty-four hours until, as expected, she deleted the evidence of her misconduct which can no longer be seen on her social media account.

315. On May 14<sup>th</sup>, 2024, Plaintiffs filed a civil crime report with the Department of Justice in the Southern District Court of New York and a cyber harassment complaint with the IC3 unit of the Federal Bureau of Investigations including information pertaining to Madison Breshears intentional harassment, threats and cyber bullying which caused Plaintiffs extreme distress for over three years and which is continuing.

316. On May 24<sup>th</sup>, 2024, Defendant was served with the Complaint and at around 3:30pm EST Plaintiffs received a voicemail from Ms. Breshears. Within the voicemail Ms. Breshears stated that she would like to have a "civil conversation" to explain herself and her conduct three years ago to avoid moving forward with this lawsuit.

317. The phone call only verified that Ms. Breshears' position has remain unchanged as she intimidated, threatened and abused her power as an attorney to deter Plaintiffs from seeking recourse against her.

***The May 27<sup>th</sup>, 2024 Phone Call Between Defendant Madison Breshears and Plaintiffs***

318. On May 27<sup>th</sup>, 2024, Plaintiffs contacted Madison Breshears via telephone and legally recorded the call as they are in the one-party consent state of South Carolina.

1       319.       On the call, Ms. Breshears undeniably admitted to a slew of misconduct and  
 2       defamation and additionally, abused her power as a licensed attorney by way of  
 3       intimidation in an attempt to deter Plaintiffs from seeking legal recourse against her  
 4       and telling them that they will not be successful in seeking justice.

5       320.       The following statements were made on the phone call which took place  
 6       between Defendant Madison Breshears and Plaintiff Taylor Button on May 27<sup>th</sup>,  
 7       2024<sup>24</sup>:

- 8       • DEFENDANT: *“It would be a good idea just to talk”.*
- 9       • PLAINTIFF: *“We tried to call you in October of last year but you didn’t really want*  
 10       *to talk when we called you at the firm”.*
- 11       • DEFENDANT: *“Um I haven’t worked at the firm in months, do you mean the cell*  
 12       *phone call? The one where you were asking, I think I talked to Dusty right? I didn’t*  
 13       *know that it was gonna be, I was gonna be called as a witness or something like that*  
 14       *for the other case that was going on so you know I don’t wanna cause any problems*  
 15       *for them or whatever.”*
- 16       • PLAINTIFF: *“You don’t really have to, they caused the problems for themselves. You*  
 17       *still are named as a witness in that case, ironically by us and not by Sage or anyone*  
 18       *else for that matter but when [Dusty] reached out to you in October she was calling*  
 19       *because, (I know you said our complaint is a bit confusing), but you can imagine that*  
 20       *it’s even more confusing to be standing in a Walgreens in Philadelphia when all of a*  
 21       *sudden on the internet it pops up that you’re a sexual predator for children when you*  
 22       *know that’s not the case and here we are three years later with this predicament so*  
 23         
 24         
 25         
 26

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27       <sup>24</sup> Plaintiffs intend to provide the entirety of the recorded call to the Court during discovery or otherwise at the  
 28       Court’s request.

1        *that's kinda where we are today. I know you said you wanted to elaborate on your end*  
 2        *but I just want to tell you in advance that we've been through depositions with*  
 3        *everyone that I have sat with personally and deposed everybody and I am not sure*  
 4        *what your relationship is with Sage or Hannah at this point but the way it came across*  
 5        *in the depositions was pretty clear. That is why we find ourselves in this position*  
 6        *today."*

- 8        • DEFENDANT: *"I didn't speak to [Sage] prior to making that post and that's not*  
 9        *accurate. Me and Hannah are close friends."*
- 10       • DEFENDANT: *"I wanna make it clear, I don't want to throw Hannah under the bus".*
- 11       • PLAINTIFF: *"She's under that bus."*
- 12       • DEFENDANT: *"I don't want to be involved in this at all."*
- 13       • DEFENDANT: *"I don't want her to be involved in this at all."*
- 14       • PLAINTIFF: *"She's involved in this."*
- 15       • DEFENDANT: *"Luckily, I'm an attorney so this isn't gonna be a problem. I can*  
 16       *represent myself pro se."*
- 17       • PLAINTIFF: *"Well you don't have to be an attorney to represent yourself pro se*  
 18       *which is why you're talking to us."*
- 19       • DEFENDANT: *"I know that for sure, but I feel comfortable doing that and I am sure*  
 20       *you guys have picked up some, you know, knowledge on how to maybe do this."*
- 21       • PLAINTIFF: *"Listen, I don't want to get into semantics. The point is, whatever*  
 22       *Hannah told you doesn't matter to us because Hannah didn't publish it online...you*  
 23       *did. You say you want to have a civil conversation but there is nothing civil about*  
 24       *doxing our private phone number, home address and information on the internet the*  
 25       *doxing our private phone number, home address and information on the internet the*  
 26       *doxing our private phone number, home address and information on the internet the*  
 27       *doxing our private phone number, home address and information on the internet the*  
 28       *doxing our private phone number, home address and information on the internet the*

second that you get a text message from either one of us. You had the opportunity to talk in October, you had the opportunity to talk when we texted you on May 13th so I don't know why you went straight to an anonymous Instagram account to just humiliate us and dox us for 20,000 people to come at us".

- DEFENDANT: "Well for one that number isn't private it's online publicly."
- PLAINTIFF: "So is yours but if I go and post it for 20,000 people in an attempt to get them to harass you, that's doxing and that's what you've done to us which is why as soon as you posted that my pregnant wife received numerous death threats again following your post on the internet just like she did in 2021 so you've been at the base of not only the destruction of our lives but you personally, your singular post in May of 2021 destroyed both of our careers and our lives."
- DEFENDANT: "This is what I wanted to talk about, I know we haven't talked about it but..."
- PLAINTIFF: "No, we haven't talked about it. We haven't talked about my wife and I wanting to kill ourselves in 2021 because of you, no we haven't"
- DEFENDANT: "Would you mind if I just told you, that's what I wanted to talk about? So uh, my intention and what I did was, I think your read of the situation was that..."
- PLAINTIFF: "My read was that my wife is a sexual predator, because that's what it says in your words".
- DEFENDANT: "Right, right right. But my post was breaking something that was not going to break, so the circumstances that I had at the time is that I heard from Hannah about what was going on with Sage...."
- PLAINTIFF: "Was Sage a child in 2017?"



- 1 • DEFENDANT: “No”.
- 2 • PLAINTIFF: “*Then why are you saying young girls and children on the internet*
- 3 *regarding my wife?*”
- 4 • DEFENDANT: “*I just knew several other dancers were going to be coming forward*
- 5 *and that the article was going to be published imminently.*”
- 6 • PLAINTIFF: “*Published... as in the New York Times?*”
- 7 • DEFENDANT: “Yeah”.
- 8 • PLAINTIFF: “*Which is not a lawsuit. You’re basing your facts on the New York*
- 9 *Times.*”
- 10 • DEFENDANT: “*No I just knew there were going to be several people coming*
- 11 *forward.*”
- 12 • PLAINTIFF: “*How did you know this?*”
- 13 • DEFENDANT: “*From Hannah*”.
- 14 • PLAINTIFF: “*How did Hannah know this?*”
- 15 • DEFENDANT: “*From Sage*”
- 16 • DEFENDANT: “*I didn’t see it as doing anything that wasn’t already going to happen*
- 17 *and I didn’t feel comfortable talking about any of the specifics and I know that*
- 18 *probably came off like I was the impetus that got things rolling...*”.
- 19 • DEFENDANT: “*I didn’t know at the time that’s how it would be and I knew at the*
- 20 *time that article was imminent and I felt like oh my gosh I was worried about these um*
- 21 *[...], yeah I mean, I have a passion for children.*
- 22 • DEFENDANT: “*I knew that you guys were around teaching kids*”.
- 23
- 24
- 25
- 26
- 27
- 28

- 1 • PLAINTIFF: *"I was not a dance teacher, what is wrong with you people? I build*
- 2 *Ferraris, exotic cars and military trucks for a living and Sage knew this. I was not*
- 3 *involved in the dance industry so why do all of you keep saying I was around*
- 4 *children? My wife was, my wife who has never met 6 of the plaintiffs who started this*
- 5 *lawsuit - who's only met Sage...so somehow you all use Dusty's name and why?*
- 6 *Because she was the biggest name in ballet and you harp on it and you say "Dusty*
- 7 *Button is a sexual predator" so now can you tell me how my wife is a sexual predator*
- 8 *because I am the only one who's met the rest of them."*
- 9
- 10 • DEFENDANT: *"The victims stories speak for themselves but I deleted all of those*
- 11 *posts after the lawsuit came out."*
- 12
- 13 • DEFENDANT: *"I wanted to allow the Court proceedings to solve themselves out and*
- 14 *let the discovery phase come out".*
- 15
- 16 • PLAINTIFF: *"And how did that work out".*
- 17
- 18 • DEFENDANT: *"I haven't been keeping tabs on it."*
- 19
- 20 • DEFENDANT: *"So the evidence is that there are over 5 people who claimed that this*
- 21 *happened to them right? If they had evidence this wouldn't be a civil case right? If*
- 22 *they had evidence this would be a criminal case."*
- 23
- 24 • DEFENDANT: *"I posted that when the #metoo movement came out, I think it went too*
- 25 *far, there were people who made false accusations or exaggerated things and there*
- 26 *were people who's lives were destroyed by that and I understand the frustration for*
- 27 *the people who's lives were destroyed by that for sure".*
- 28
- PLAINTIFF: *"If you do, then how are you on the internet posting our text to you while*
- saying you are empathetic to those lives?"*

- 1 • DEFENDANT: ***“I did not know you were going to sue me!”***
- 2 • PLAINTIFF: *“Now you say that you didn’t know that The New York Times was going*
- 3 *to post it later, and you didn’t know this was going to be the catalyst to that”.*
- 4 • DEFENDANT: ***“I did know, that’s why I posted it. That’s why I posted it.”***
- 5 • DEFENDANT: *“I did not know when that article would be coming out, I heard maybe*
- 6 *it was a month out.”*
- 7 • PLAINTIFF: *“What did you see, what were you provided prior to publishing that my*
- 8 *wife is a sexual predator thus destroying her entire career”.*
- 9 • DEFENDANT: *“I heard a first-hand account”.*
- 10 • DEFENDANT: *“Firstly, your wife is an international ballet star.”*
- 11 • DEFENDANT: *“I didn’t think that my post would make that big of a splash frankly*
- 12 *but it seems to have done so.”*
- 13 • DEFENDANT: *“What I wanted to get across was that it was imminent that the article*
- 14 *from the New York Times was coming out with the victims and it had nothing to do*
- 15 *with any of that.”*
- 16 • DEFENDANT: *“This is what I think, Mitchell and Dusty, I seriously don’t want to*
- 17 *have - I haven’t said anything about this, and I haven’t tried to cause any...I know that*
- 18 *the damage, I am sure the damage was real that I caused.”*
- 19 • DEFENDANT: *“At the time I felt that because the article was already coming out*
- 20 *about the victims, I knew it was imminent I didn’t feel like, it didn’t feel like I was*
- 21 *doing something hugely damaging at the time. I understand in retrospect that’s how*
- 22 *it... it did do damage.”*
- 23 • DEFENDANT: ***“I don’t even know that I knew for certain a lawsuit was imminent”.***
- 24
- 25
- 26
- 27
- 28

- 1 • DEFENDANT: “*Yeah I don’t know that I knew that. I’ll have to go back and look at*
- 2 *texts to see if I knew that for sure but all I knew is that for sure several victims,*
- 3 *“alleged victims”.*
- 4 • PLAINTIFFS: “*Have you talked to anyone in this litigation aside from Sage?*”
- 5 • DEFENDANT: “*No.*”
- 6 • PLAINTIFF: “*So you went on the internet and spoke on all of their behalves?*”
- 7 • DEFENDANT: “*I trusted my friend Hannah, she’s a very good friend of mine since 13*
- 8 *years old.*”
- 9 • DEFENDANT: “*I am gonna tell you right now that it looks like a ton of work that you*
- 10 *guys put into this complaint, it’s 130 pages... ”.*
- 11 • DEFENDANT: “*I realize now that it seems like asking people to come forward is*
- 12 *what made them come forward but I already knew about how many victims were*
- 13 *coming forward... ”.*
- 14 • PLAINTIFF: “*So you knew Jane Doe?*”
- 15 • DEFENDANT: “*No but I knew that she had been interviewed by the New York Times*
- 16 *and that the article was just pending publication.*”
- 17 • PLAINTIFF: “*So you knew that Jane Doe had spoken to the New York Times?*”
- 18 • DEFENDANT: “*Yes.*”
- 19 • PLAINTIFF: “*Because she didn’t and nobody besides Gina or Sage spoke to the*
- 20 *New York Times, nobody did.*”
- 21 • PLAINTIFF: “*You say you came forward because these people had talked to the New*
- 22 *York Times*”
- 23
- 24
- 25
- 26
- 27
- 28

- 1 • DEFENDANT: *“That literally is why I did it. I thought it was a foregone conclusion*
- 2 *that it was coming out but not for maybe a month or so...”*
- 3 • DEFENDANT: *“I haven’t been in the dance industry since I was 16 years old.”*
- 4 • PLAINTIFF: *“Then why do you run an anonymous account called real world*
- 5 *ballerina?”*
- 6 • DEFENDANT: *“Cuz I still have it with so many followers on it but I made that*
- 7 *account when I was fourteen years old and it blew up because I was the first meme*
- 8 *account at the time because nobody was doing that.”*
- 9 • DEFENDANT: *“I had like 40,000 followers and then that account I stopped posting*
- 10 *on it back in 2013 then I was sporadically once a year - so it dwindled down to like*
- 11 *what it is now.”*
- 12 • PLAINTIFF: *“Do you feel like you were justified because a friend told you something*
- 13 *to destroy our lives.”*
- 14 • DEFENDANT: *“I knew it was coming out in the New York Times which is a reputable*
- 15 *publication.”*
- 16 • DEFENDANT: *“At the time I trusted my friend. I wanna see how the lawsuit comes*
- 17 *out and probably 5 people wouldn’t... if it was just Sage, I wouldn’t have done it”.*
- 18 • PLAINTIFF: *“When you said DUSTY BUTTON IS A PREDATOR, that wasn’t I heard*
- 19 *Dusty Button is a predator, it wasn’t my friend told me that she is and I’m concerned*
- 20 *about a bunch of children so I might say this out loud so people get a warning because*
- 21 *they as in her somehow, because I’m not a dance teacher, are still working with*
- 22 *children - why did you say the words, ‘Dusty Button is’ because that’s a certainty it’s*
- 23 *not a possibility, it’s not ‘I heard this is coming out in the New York Times’.”*
- 24
- 25
- 26
- 27
- 28

- 1 • DEFENDANT: *"I just want to tell you that it's gonna be bad if you sue me."*
- 2 • PLAINTIFF: *"Is this a warning? Are you warning us?"*
- 3 • DEFENDANT: *"It's not worth your time and energy or mine".*
- 4 • PLAINTIFF: *"So you're doing this out of the graciousness of your heart to help us?"*.
- 5 • DEFENDANT: *"You are going through enough right now..."*.
- 6 • DEFENDANT: *"There is consequences to filing frivolous or not legally viable*
- 7 *lawsuits"*.
- 8 • PLAINTIFF: *"Why would you believe this is a waste of our time?"*.
- 9 • DEFENDANT: *"As a lawyer, going through your complaint the causes of action that*
- 10 *you are listing with the facts that even just based on I'm gonna write my motion to*
- 11 *dismiss, I'm not going to be arguing the facts, I'm going to be arguing the law and*
- 12 *based on the law and the claims that you've made you haven't stated a claim upon*
- 13 *which relief can be granted so... and that's sanctionable. You shouldn't be filing*
- 14 *frivolous lawsuits and if you are planning on doing this to multiple people..."*
- 15 • PLAINTIFF: *"Listen...I appreciate your advice but as you know providing unsolicited*
- 16 *legal advice to anyone is what you are not supposed to be doing as an attorney so I*
- 17 *think it's odd that you are here warning us while providing legal advice to us, don't*
- 18 *you think that is a conundrum?"*
- 19 • DEFENDANT: *"I am just saying I don't want to do this. I don't think it's worth your*
- 20 *time, it's not gonna end well for you."*
- 21 • PLAINTIFF: *"You took three years of our lives, you nearly took our fucking lives so I*
- 22 *can tell you every second that we take from yours is worth everything so moving*
- 23 *forward understand this...Buckle up because as long as this can last, we will assure it*
- 24
- 25
- 26
- 27
- 28



1        *will and this isn't a call where you go your way and we go ours - you are on the*  
 2        *internet acting like a child, own up to it...have some accountability and we will see*  
 3        *you in Court...that's the end of this call."*

4        ***Madison Breshears' destruction of Plaintiffs' business, goods and services***

5  
 6        321.        As stated in the above references, Plaintiffs' names and likeness was their *only*  
 7        *business*, which generated literally all of their revenue, income and business, whereas  
 8        Plaintiffs, themselves, and what they provided to their respective industries was solely  
 9        based on what they provided as their name brands known as Dusty Button, Taylor  
 10        Button, Mitch/Mitchell Button, Mitchell Taylor Button, "The Buttons", Button Built,  
 11        Button Brand and Bravado by Dusty Button.

12  
 13        322.        Plaintiffs' established business, goods and services were directly sourced and  
 14        provided from their good names, talent, expertise and reputations, which were  
 15        completely destroyed by Madison Breshears and her defamatory posts and remarks.

16        323.        As stated in the above referenced facts, Plaintiffs were highly respected,  
 17        extremely well-known, leaders of the dance industry and the automotive industry, and  
 18        reliant on their businesses which were well established for over fifteen years, as each  
 19        Plaintiff was their own business in which they were hired based on their desired skill  
 20        sets in their industries, which others could not offer.

21  
 22        324.        Plaintiffs had established business with signed negotiated contracts with three  
 23        companies to manufacture and sell their dancewear line which was in its initial phase  
 24        and well under way as Plaintiffs were beginning the second wave of these partnerships  
 25        when this defamatory post by Madison Breshears derailed all operations.

1 325. Plaintiffs lost any and all business immediately and for the foreseeable future  
2 as a direct result of Madison Breshears' intentionally false and defamatory, viral social  
3 media remarks.

4 326. Madison Breshears made her statements with actual malice as she knew that,  
5 as a result of the publications, the Plaintiffs would suffer financial harm.

6 327. Madison Breshears knew that her statements were false and intentionally  
7 crippled Plaintiffs' business and ability to generate revenue and income as she  
8 maliciously referred to Plaintiffs' goods and services because the "power" she claims  
9 Plaintiffs "abused" was the power of their business which was their talent, expertise  
10 and their reputable names.

11 328. Madison Breshears knew that her statements were false and intentionally  
12 crippled Plaintiffs' goods and services which included Plaintiff Dusty Buttons'  
13 teaching, provided choreography, modeling, dancing, guest performing, speaking  
14 engagements, design concepts, marketing and brand ambassadorship, all of which  
15 were destroyed as Plaintiff Dusty Button was her own goods and services, as her name  
16 and career was her brand and her business.

17 329. Madison Breshears knew that her statements were false and intentionally  
18 crippled Plaintiffs' goods and services which included Plaintiff Taylor Buttons' design  
19 work, custom automotive creations, sponsorships, commercial shoots, events,  
20 marketing, advertising and speaking engagements, all of which were destroyed as  
21 Plaintiff Taylor Button was his own goods and services, as his name and career was  
22 his brand and his business.

330. Madison Breshears intentionally, willfully and maliciously published  
defamatory statements to hundreds of thousands of third parties on social media.

331. Defendants' defamatory post spread like fuel-soaked wildfire throughout the  
dance industry and community, automotive industry and community and further, to  
dance and automotive forums including but not limited to Facebook, Reddit and  
TikTok and was widely spread via communications through various messaging  
platforms nationally and internationally.

332. Madison Breshears' defamatory remarks were not only spread in written form  
but were widely spread via word of mouth through the grapevine of the industries  
which Plaintiffs were so highly respected and prominent in.

333. Madison Breshears was the owner, user and publisher of these defamatory  
remarks and posts in which she had complete control and ownership of a  
communication platform, using her influence and abuse of power to reach hundreds of  
thousands of people to intentionally, willfully and maliciously defame Plaintiffs while  
knowingly inflicting intentional harm on Plaintiffs and their business and reputations.

334. Madison Breshears' defamatory posts and remarks to a mass media audience  
was intentionally dishonest and was posted for an improper motive with the intent to  
injure Plaintiffs without just cause or excuse.

335. Madison Breshears knew that, as a result of the publications, Plaintiffs would  
suffer financial harm and never be capable of generating revenue using their names  
again.

1 336. Plaintiffs suffered complete loss of business and sales including that their  
2 income was solely based on a per performance basis whereas, Plaintiffs' income was  
3 generated upon completion of work as they were themselves, their business.

4 337. For example, Plaintiff Dusty Button's teaching classes and performances were  
5 immediately canceled on May 14<sup>th</sup>, 2021 following Madison Breshears' defamatory  
6 posts, including but not limited to the scheduled classes and performances with Artists  
7 Simply Human which were terminated indefinitely, as a direct result of Defendants'  
8 defamatory posts.  
9

10 338. As another example, Plaintiff Dusty Button immediately lost any and all  
11 business with all scheduled dance studios, summer intensive courses, and events  
12 which she was scheduled to guest teach, choreograph for, including scheduled guest  
13 performance appearances nationally and internationally as a direct result of Madison  
14 Breshears' defamatory posts and remarks.  
15

16 339. As another example, Plaintiff Taylor Button immediately lost any and all  
17 business related to his brands including his business and brand "Button Built", with all  
18 scheduled events in the automotive industry including pre-planned design builds for  
19 clients and customers including prominent name brands which were sponsors of  
20 Plaintiff Taylor Button, all of whom canceled their builds and design concept work  
21 with Plaintiff for the foreseeable future.  
22

23 340. Further, Plaintiffs both immediately lost any and all contracts with sponsors,  
24 endorsements and event appearances in their respective industries including but not  
25 limited to: BLOCH Inc., Tiger Friday, Capezio, Yumiko, MPG Sport, Fenti, Volcom,  
26 Discount Dance, RedBull, Adidas, WeWork, Rotiform Wheels, Brixton Forged,  
27  
28

1 Momo racing, Bride Racing, Nitto Tires, Toyo tires, Brembo, Ferrari Parts, Tial  
2 Concepts, Xona Rotor, Aviva Performance, Impressive Wraps, Inozetek, Tubi Style,  
3 Vivid Motorsport, Voodoo Automotive, SEMA Auto Show, Crep Protect, Accuair  
4 Suspensions, Currie axels, Pelican LLC, Greyman Tactical, PRP seats, KMC wheels,  
5 RAM mounts, Metalcloak suspension and body components, THULE, Rebel Offroad,  
6 PPG paint, Morimoto LED lighting solutions, BAJA off-road lighting solutions,  
7 Powertank, Maxxtraxx, HP tuners, Emory Motorsports, SABELT and Illest, amongst  
8 many others not listed here.  
9

10 341. Plaintiffs not only lost their business “Button Brand”, suffering the complete  
11 destruction of their self-made brand but were forced to refund customers for items sold  
12 due to the connection of the defamatory posts and remarks made by Madison  
13 Breshears and the third parties who “grapevined” off of her defamatory post.  
14

15 342. Plaintiffs completely lost and forfeited their brand, Button Brand, as of May  
16 13<sup>th</sup>, 2021.

17 343. Plaintiffs had a pre-planned, negotiated contract with dancewear company  
18 Tiger Friday whereas, Plaintiffs designed, licensed and would market the line of  
19 leotards and dancewear utilizing the Button name and brand to expand their already  
20 successful company and image.  
21

22 344. Plaintiffs’ contract was immediately canceled as a direct result of Defendants’  
23 defamatory post and remarks.

24 345. Plaintiffs were not paid for work already completed as Tiger Friday continued  
25 to use Plaintiffs’ already completed designs, due to the false and defamatory posts and  
26 remarks made by Madison Breshears.  
27  
28

1 346. Plaintiffs' brand, Bravado by Dusty Button was a dancewear and leotard line  
2 for dancers in which Plaintiffs had previous negotiated contracts with sponsored third-  
3 party companies and distributors such as Discount Dance, Showstopper and GK Elite,  
4 as well as advertised and garnered sales of this line through their own website  
5 "bravadodancewear.com" and through Plaintiffs' former social media page on  
6 Instagram, @bravado\_dancewear and Plaintiffs' personal social media account,  
7 @dusty\_button.  
8

9 347. Bravado by Dusty Button was sold at various dance events for distribution,  
10 whereas, sales and contracts were immediately terminated following \$100,000.00 of  
11 partner investment and nearly a year of travel and planning as a direct result of  
12 Madison Breshears' defamatory posts and remarks.  
13

14 348. Defendants' defamatory posts and remarks forced the termination of Bravado  
15 by Dusty Button as all sales came to a halt and additionally, customers demanded  
16 refunds stating the brand was associated with "sexual predators" and "rapists".

17 349. Immediately following Madison Breshears' defamatory posts and remarks on  
18 May 13<sup>th</sup>, 2021, Plaintiffs' businesses, Button Brand, Button Built, and Bravado by  
19 Dusty Button were completely destroyed, losing hundreds of thousands of dollars in  
20 revenue and costs, which were already paid, promised and negotiated with third party  
21 companies and distributors.  
22

23 350. Any and all marketing for the above reference brands with associated accounts  
24 advertising those brands including all sales were terminated as a direct result of  
25 Madison Breshears' false and defamatory posts and remarks.  
26  
27  
28

1 351. The seriousness of Defendants' defamatory statements proves a clear intention  
2 to cause damage to Plaintiffs including but not limited to the additional admissions by  
3 Ms. Breshears on the phone on May 27<sup>th</sup>, 2024.

4 352. The nature and substance of Defendants' defamatory posts, remarks and actual  
5 knowledge that her statements were untrue prove that Defendants' actions were  
6 willful, intentional and malicious.

7  
8 353. Defendants' publications and the audience that the Defendant intended to, and  
9 did reach, proves without question, her intent to harm Plaintiffs' careers, businesses  
10 and reputations as the false publications were aimed specifically at Plaintiffs'  
11 colleagues, clients and target demographics though eventually, these false publications  
12 reached so far as the New York Times, Cosmopolitan, the Boston Globe, ABC news  
13 and other mass media outlets including the press and nearly every major news outlet  
14 and social media account that were otherwise outside of Plaintiffs' industries.

15  
16 354. Madison Breshears' defamatory posts and remarks caused the *entire* dance  
17 industry to not only turn against Plaintiff Dusty Button, (who had worked her entire  
18 life to build the reputation she was known for in her industry and was at the pinnacle  
19 of her career), but caused the industry to disassociate from Dusty, repost the  
20 defamatory statements and cease all communication with her, including halting any  
21 and all forms of employment for which she had been in extremely high demand for,  
22 for over fifteen years.

23  
24 355. Madison Breshears' defamatory posts and remarks caused the *entire*  
25 automotive industry to not only turn against Plaintiff Taylor Button, (who had worked  
26 over thirteen years to build the reputation of the idol he was and that he was known for  
27  
28



1 in his industry and was at the pinnacle of his career), but caused the industry to  
2 disassociate from Taylor, repost the defamatory statements and cease all  
3 communication with him, including halting any and all forms of employment for  
4 which he had been in extremely high demand for, for over thirteen years.

5  
6 356. The defamatory remarks and posts made by Madison Breshears ignited a viral  
7 response which spread like wildfire, resulting in a ‘grapevine’ effect throughout  
8 Plaintiffs’ industries including to their co-workers, clients, employers, potential  
9 employers, parents and children of those Dusty taught in the dance industry, sponsors,  
10 potential sponsors, friends and family involved in the industries, customers, former  
11 employers, agencies, dance studio owners and other various third parties whereas,  
12 Plaintiffs could not defend themselves against such widespread industry gossip.

13  
14 357. Madison Breshears targeted Plaintiffs who were influential and informative  
15 people in their industries in which the Defendant spread false statements further than it  
16 would seem at first blush.

17 358. Plaintiffs were completely prevented from defending themselves to all third  
18 parties as Defendants’ defamatory statements were so immediately viral and out of  
19 control, that Plaintiffs could not control or manage the effects of Madison Breshears’  
20 false, defamatory and malicious statements.

21  
22 359. As a direct cause of Madison Breshears’ false and defamatory post, Plaintiffs  
23 have been unable to even have a ringtone, vibration or sound on their phones when  
24 notifications or calls due to the influx of notifications, messages, harassment, death  
25 threats, unwanted threatening calls and the overwhelming immediate responses to  
26 Defendants’ posts, comments and reposts whereas, Plaintiffs even had to take turns  
27  
28

1 watching for notifications on each other's phones to even sleep just one hour for  
2 months on end as the harassing, threatening and defamatory remarks continued for  
3 months on end.

4  
5 360. To this day, Plaintiffs keep their phones on silent as it results in severe trauma  
6 and PTSD as a direct result of Madison Breshears' defamatory posts and remarks.

7 361. As previously stated herein, Plaintiffs' business, was their names and likeness  
8 as they were individually contracted due to their reputations of who they were as a  
9 business and as their names were their brands.

10 362. Plaintiffs were well-known and prominent figures in their industry and  
11 therefore, were contracted, employed and in high-demand because of their names and  
12 reputations, as they, themselves were their businesses for over fifteen years.

13  
14 363. Plaintiffs' reputations, *prior* to Defendants' defamatory posts and remarks and  
15 the slaughter of Plaintiffs' good names, was impeccable in both their respective  
16 industries whereas, Plaintiffs were well-liked, well-respected and in high demand due  
17 to their expertise in their industries, which others could not offer.

18 364. Defendant has never made any attempt to rectify the false and malicious  
19 statements and in fact, doubled down on her defamatory statements on May 14<sup>th</sup>, 2024  
20 by posting the false and defamatory statement "Dusty Button is a sexual predator" to  
21 her account @real\_world\_ballerina to a new audience which otherwise may not have  
22 seen the post in 2021.

23  
24 365. In fact, upon discovery and confirmation that the anonymous account  
25 @Real\_World\_Ballerina was owned and controlled by Madison Breshears, Plaintiffs  
26 called Madison Breshears whereas, she stated that she would not speak on the  
27  
28

1       defamatory posts or remarks she made and instead, stated she would *only* provide  
2       statements if it was Court ordered.

3       366.       Defendant has never made a public statement on her personal account  
4       @mjbreshears or her anonymous account @Real\_World\_Ballerina acknowledging her  
5       defamatory statements to be false to all third parties who witnessed the original  
6       publication or otherwise, who reposted and spread the defamatory statements  
7       themselves, as a direct result of Madison Breshears' malicious conduct.

8       367.       Defendant has erased any and all relative defamatory remarks and posts that  
9       would render her responsible for those posts or remarks as well as any history of her  
10       previous intentional infliction of harm against Plaintiffs in an effort to avoid  
11       consequences.

12       368.       Madison Breshears' actions constitute more than this instant litigation as her  
13       harassment, which resulted in death threats against Plaintiffs constitute action against  
14       her which is not civil, but criminal, per New York state law.

15       369.       No attempt to rectify the defamatory posts from Defendant would suffice, as it  
16       would make no difference in the destruction and trauma caused by Defendant,  
17       however, no attempt has ever been made.

18       370.       Defendants' spoilation of evidence which proves she intentionally, willfully  
19       and maliciously posted defamatory statements about Plaintiffs is evidence that Ms.  
20       Breshears, (as an attorney), is undoubtedly aware of her actions and the harm she  
21       intentionally inflicted on Plaintiffs and which proves that Ms. Breshears' conduct *must*  
22       have consequences.  
23  
24  
25  
26  
27  
28

1 371. The shock and confusion resulting from the defamatory statements, coupled  
2 with Madison Breshears' intense threats, harassment, and severe bullying including  
3 the use of her law degree to intimidate and silence Plaintiffs and those associated, led  
4 Plaintiffs to believe recourse would be an impossibility against her including as recent  
5 as May 27<sup>th</sup>, 2024.  
6

7 372. Plaintiffs were so traumatized by Defendants' actions that they both suffered  
8 from suicidal thoughts, nearly taking their own lives as a direct result of the  
9 defamatory posts and remarks made by Madison Breshears.

10 373. Plaintiffs were immediately terminated by any and all employers, contractors,  
11 associates and sponsors following Defendants' defamatory post on May 13<sup>th</sup>, 2021,  
12 therefore crippling their ability to generate any income for the foreseeable future.  
13

14 374. Madison Breshears hid behind an anonymous account  
15 @Real\_World\_Ballerina to post her defamatory remarks against Plaintiffs on May  
16 13<sup>th</sup>, 2021.

17 375. Plaintiffs were unable to **confirm** @Real\_World\_Ballerina was Madison  
18 Breshears' account until 2023 by way of the discovery process in the Nevada  
19 litigation.  
20

21 376. Madison Breshears took affirmative steps to ensure Plaintiffs were without the  
22 ability to seek recourse against her in 2021 with the threat of a law degree, an  
23 anonymous username, threatening statements and intentional harm which she inflicted  
24 on Plaintiffs by way of forcing them to be unemployed with no ability to generate  
25 income, releasing her of any responsibility as she knew her statutes of limitation  
26 would expire before Plaintiffs could take action against her.  
27  
28

377. Defendants' defamatory campaign against Plaintiffs was directly responsible for hundreds of death threats and a hired convicted felon that was paid nearly \$100,000.00 to force Plaintiffs to destroy evidence that Defendants' defamation was meant to conceal; a felon who broke into Plaintiffs' home and thus rendered them in fear of their lives.

378. Accordingly, any statute of limitations applicable to Dusty and Taylor's claims, if any, is tolled.

379. Madison Breshears' actions described above deprived Dusty and Taylor of the opportunity to commence this lawsuit before now.

380. Madison is equitably estopped from asserting a statute of limitations defense as to Plaintiffs' claims.

381. Allowing Madison to do so would be **unjust**.

382. Madison took active steps to prevent Dusty and Taylor from commencing this lawsuit before now, including by destroying Plaintiffs' inability to work after May 13<sup>th</sup>, 2021, using an anonymous account to hide behind an alias which could not be discovered or confirmed without investigation, (requiring finances Plaintiffs did not have as a direct result from Defendants' conduct), and using tactical intimidation by way of using her law degree to suppress and silence Plaintiffs from defending against her false and defamatory posts and remarks.

383. Plaintiffs have suffered and continue to suffer mental anguish, severe emotional distress and loss of enjoyment of life as a direct and proximate result of Madison Breshears' defamatory and malicious posts and remarks.

1 384. Plaintiffs have *actual knowledge* that substantial additional evidentiary  
2 support, which is in the exclusive possession of Madison Breshears and other third  
3 parties including but not limited to non-party co-conspirator, Hannah Stolrow and  
4 Defendants and their agents and other third-parties, will exist for the allegations and  
5 claims set forth above after a reasonable opportunity for discovery and including  
6 because Ms. Breshears made the statements on May 27<sup>th</sup>, 2024 that she had text  
7 messages and direct messages that she could access regarding this instant complaint  
8 and the defamatory statements made by Defendant.  
9

10 385. Had Plaintiffs succumbed to the darkness that Madison Breshears cast over  
11 their lives, businesses, families and futures, this litigation would be criminal rather  
12 than civil as she and only she, is responsible for serving as the catalyst of fraudulent  
13 actions that nearly ended two lives that were once the brightest lights of their careers  
14 for millions of people abroad.  
15

16 **CAUSES OF ACTION**

17 **COUNT I - INJURIOUS FALSEHOOD**  
18

19 386. Plaintiffs incorporate by reference and reallege the preceding allegations as  
20 though fully set forth herein.

21 387. Defendant reinstated Plaintiffs timely claim of Injurious Falsehood by posting  
22 false and defamatory statements to a new audience on May 14<sup>th</sup>, 2024 including by  
23 stating, “Dusty Button is a sexual predator” to any viewer or reader that otherwise may  
24 not have seen the original false and defamatory post on May 13<sup>th</sup>, 2021.  
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1 388. Plaintiffs' claim of Injurious Falsehood is **not** time-barred as N.Y. provides a  
2 three-year statute of limitations from the time of injury for Injurious Falsehood<sup>25</sup>.  
3 Defendants' defamatory posts were made on May 13<sup>th</sup> and 14<sup>th</sup>, of 2021. Plaintiffs  
4 filed their complaint on May 13<sup>th</sup>, 2024, therefore, Count I of Injurious Falsehood is  
5 timely and **must not** be dismissed.  
6

7 389. The unprivileged statements made by Defendant to others about Plaintiffs were  
8 false and defamatory.

9 390. The Defendant's words were maliciously calculated to cause financial injury,  
10 constituting Plaintiffs' claim of Injurious Falsehood.

11 391. Defendant published false statements and communicated those false statements  
12 to a mass audience of third parties.  
13

14 392. The Defendant's posts contained intentional false and defamatory statements  
15 which does not express statements of opinion and are not protected by any defense  
16 such as opinion defense or defamation liability.

17 393. The Defendant's posts contained statements of fact, proven to be false  
18 including but not limited to within the Nevada litigation whereas, a majority of  
19 evidence on the record is sealed by the Court in Nevada; regardless, Defendant made  
20 statements of fact which was not based on any such statement within the lawsuit in  
21 which her posts were not about, as the defamatory posts were created and published  
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25  
26 <sup>25</sup> Consolidated Laws of New York. Civil Practice Law and Rules CH 8 Article 2 Section 214 (2019);  
27 Restatement (2d) of Torts, § 623A; Restatement (2d) of Torts, § 630; Court Opinions.  
28



1 for the sole purpose of being the first to “break the story” regardless of the truthfulness  
2 or falsity and without verification of the hearsay relied upon.

3 394. Defendant is liable for controlling the platform on which the false and  
4 defamatory statements were made.

5 395. Defendant made these false and defamatory statements with *actual malice* and  
6 or reckless disregard for the truth including because she admitted to her personal  
7 interest in Plaintiffs.  
8

9 396. Defendants’ posts, false statements and defamatory remarks were the direct  
10 cause of Plaintiffs’ complete loss of business and sales related to their names, likeness  
11 and brands whereas, Plaintiffs suffered actual damages, proven by bank statements,  
12 email and text communications, approval of government assistance programs, loss of  
13 counsel, loss of employment and other economic and financial evidence of damages as  
14 a result of Madison Breshears’ false a defamatory posts and remarks.  
15

16 397. Defendant’s posts contained a false, defamatory and intentionally malicious  
17 statement which was only made to amplify her posts, made solely for shock value and  
18 which severely harmed Plaintiffs and caused extreme emotional distress.

19 398. Plaintiffs claim special damages to be proven through contractual agreement,  
20 financial records and messages which prove Madison Breshears’ posts were the direct  
21 and proximate cause of Plaintiff’s complete and total loss of businesses, business  
22 relations, affiliates, and/or any and all contractual agreements including but not limited  
23 to the reputations, careers and livelihoods in their respective industries.  
24

25 399. The unprivileged statements made by Defendant to others about Plaintiffs  
26 caused complete loss and injury to Plaintiffs business whereas, Plaintiffs have not  
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28

1 worked one single job since May 13<sup>th</sup>, 2021 including that any and all contracts and  
2 agreements were immediately and prematurely terminated following Defendants'  
3 conduct.

4  
5 400. Defendant published such statements negligently, with knowledge of the  
6 falsity of the statements, and/or with reckless disregard of their truth or falsity.

7 401. Ms. Breshears' statement is not protected by New York's anti-SLAPP law as  
8 her statements were false statements of fact, not a statement of opinion and therefore,  
9 unprotected by First Amendment rights or any other law which would relieve Ms.  
10 Breshears from the consequences to her actions.

11 402. At the time such statements were made, Defendant knew or *should have known*  
12 that they were false and defamatory including because Defendant admitted that "*if it*  
13 *were just Sage by herself, I wouldn't have posted it*"; whereas, Sage Humphries is the  
14 only party to the lawsuit which Plaintiff Dusty Button has met.

15  
16 403. Hundreds of thousands of people actually read and/or heard the false and  
17 defamatory statements.

18 404. The statements were not privileged.

19 405. The statements were published by Defendant with actual malice, oppression,  
20 and/or reckless disregard for the truth in that they were aware at the time of the falsity  
21 of the publication and thus, made said publications in bad faith, out of hatred and ill-  
22 will directed towards Plaintiffs without any regard for the truth.

23  
24 406. Defendant possessed information and had access to information that showed  
25 her statements were false including but not limited to video and photo evidence and  
26 text messages.

1 407. Defendant also made statements for which she had no factual basis.

2 408. Defendant did not verify the accuracy of the allegations before making her  
3 defamatory statements and therefore, made her statements out of neglect, reckless  
4 disregard for the truth and/or actual malice.

5 409. Moreover, the statements tend to so harm the reputation of Plaintiffs as to  
6 lower their professional reputation in the community or deter third persons from  
7 associating or dealing with them including termination of any and all business,  
8 contracts or employment and, as such, constitute *injurious falsehood*.

9 410. As stated, *supra*, Ms. Breshears relied on hearsay from a third party and *did*  
10 *not actually speak* to any of the Plaintiffs, aside from her friend Sage Humphries,  
11 involved in the Nevada litigation prior to or after making her false and defamatory  
12 statements and therefore, did not verify or research any of her statements prior to  
13 making and publishing them to a mass audience.

14 411. Ms. Breshears admitted she did not know if a “*lawsuit was imminent*” therefore  
15 confirming she made her statements solely for the purpose of seeking attention as she  
16 admitted she knew months prior to the New York Times article being published that  
17 she knew of the article but wanted to be the first to post, resulting in crippling  
18 Plaintiffs defense in a litigation as they lost any and all ways to generate income to  
19 fund their defense as a direct and proximate result of her conduct.

20 412. As a proximate result of the maliciously false and defamatory publication of  
21 statements to third parties by Defendant, Plaintiffs have been severely damaged.

22 413. Ms. Breshears’ post was a direct cause of Plaintiffs’ complete loss of business  
23 and sales related to their names, likeness and brands whereas, Plaintiffs suffered  
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1 *actual damages* and special damages, proven by bank statements, email and text  
2 communications, approval of government assistance programs, loss of counsel, loss of  
3 employment and other economic and financial evidence of damages as a result of  
4 Madison Breshears' false and defamatory statements made to a mass audience.

5  
6 414. The statements were made by Madison Breshears with reckless disregard for  
7 the truth, oppression and fraud in that she was aware at the time of the falsity of the  
8 statement.

9 415. Defendant made statements which had *no factual basis* including that Ms.  
10 Breshears stated on a recorded phone call on May 27<sup>th</sup>, 2024, that she "knew that [Jane  
11 Doe] had been interviewed by the New York Times and that the article was just  
12 pending publication which is impossible, as Jane Doe never spoke to The New York  
13 Times and only came forward after she read about the article in the New York Times,  
14 as stated by Jane Doe, herself; proving Ms. Breshears' continues to lie about her  
15 involvement and made false statements of fact.

16  
17 416. The statute of limitations for defamation claims, including injurious falsehood  
18 may be tolled, "*during the pendency of a related lawsuit or arbitration related to the*  
19 *same defamatory statements*" and, "*the pendency of a motion to dismiss a related*  
20 *lawsuit may toll the statute of limitations until the motion is resolved*" whereas,  
21 Plaintiffs have been involved in a pending litigation for exactly three years with  
22 Defendants Ruff, Mariella and non-party co-conspirator Sigrid McCawley and their  
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clients, resulting in any ability to financially afford representation and preventing Plaintiffs from seeking recourse against Defendants until now.<sup>26</sup>

417. In the event any applicable statutes apply, Plaintiffs' claims of defamation must be tolled for the following reasons including but not limited to:

- 1) *"During the pendency of a related lawsuit or arbitration related to the same defamatory statements"* whereas, Defendant's defamatory posts and statements are at issue in **five other pending lawsuits**<sup>27</sup> and, *"the pendency of a motion to dismiss a related lawsuit may toll the statute of limitations until the motion is resolved"* whereas; Defendant's motion to dismiss a related lawsuit has been pending since August 24<sup>th</sup>, 2023.
- 2) Threats from a licensed attorney in an attempt to prevent Plaintiffs from seeking recourse against her; such as statements which were made online by Ms. Breshears in 2021 including but not limited to, "I'm a law student, I know libel and slander and this isn't it", later doubling down to prevent Plaintiffs from seeking legal recourse against her by stating on May 27<sup>th</sup>, 2024, including but not limited to, *"This isn't going to end well for you"* and *"I just want to tell you that it's gonna be bad if you sue me"*.

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<sup>27</sup> See Case 1:24-cv-5888 – Button et al v. The New York Times Company et al.; Case 1:24-cv-05026 –JPC Button et al v. Doherty et al; Case 0:24-cv-60911-DSL – Button et al v. McCawley; Case 1:24-cv-00220 – Button et al v. Hickie et al. and Case 2:21-cv-01412-ART-EJY.

- 3) A continuing wrong<sup>28</sup> such as Defendants’ May 14<sup>th</sup>, 2024 reposting the exact same defamatory statements made to a mass audience that she posted in 2021, with the intent to harass Plaintiffs<sup>29</sup> including by posting to a new audience, “PSA: Dusty Button is a sexual predator” and;
- 4) Defendants’ online misconduct, remaining anonymous to avoid consequence and recourse<sup>30</sup>.

418. Defendants made false and defamatory statements to a mass audience in which were so widely understood to be harmful that they are presumed to be defamatory as Defendants made statements which accused Plaintiffs of committing crimes against children, particularly, (“young girls”).

419. Ms. Breshears’ statement is not protected by New York’s anti-SLAPP law as her statements were false statements of fact, not a statement of opinion and therefore, unprotected by First Amendment rights or any other law which would relieve Ms. Breshears from the consequences to her actions.

420. Defendants’ defamatory statements were intentionally and specifically timed to prevent Plaintiffs from seeking recourse against her as Plaintiffs could not afford to file claims against Defendant, as her defamatory statements *immediately destroyed* Plaintiffs’ ability to work and to generate income; this was an additional and *intentional act* so that Plaintiffs could not seek recourse against Defendant until now.

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<sup>28</sup> Defendant’s conduct on May 14<sup>th</sup> and 27<sup>th</sup>, 2024 constitutes a “continuing wrong” whereas, “under the doctrine, where there is a series of continuing wrongs,” the statute of limitations will be tolled to the last date on which a wrongful act is committed. *Henry v. Bank of Am.*, 147 A.D.3d 599, 601 (1st Dept. 2017).

<sup>29</sup> If the defamatory statement is part of a continuing wrong, such as a series of false statements or a campaign of defamation, the statute of limitations may be tolled until the wrong ceases. (N.Y. C.P.L.R. § 214-a).

<sup>30</sup> If the defendant fraudulently conceals the defamatory statement, the statute of limitations may be tolled until the plaintiff discovers the truth. (N.Y. C.P.L.R. § 214).

421. Defendant is equitably estopped from asserting a statute of limitations as a defense; allowing her to do so would be **unjust**.

422. Plaintiffs' statutes, *if any*, **must be tolled**.

423. Defendants' statements are not supported by evidence or facts; therefore, the Defendant cannot rely on the truth privilege to defend against the claim.

424. Because Defendant's defamatory statements constitute intentional acts which were made with actual malice towards Plaintiffs and/or reckless disregard for the truth, Plaintiffs seek an award for punitive damages.

WHEREFORE, Plaintiffs Dusty and Taylor Button demand judgment against Defendant Madison Jane Breshears for damages, punitive damages, court costs, and such other relief as the Court deems just and proper.

#### **COUNT II - DEFAMATION PER SE**

425. Plaintiffs incorporate by reference and reallege the preceding allegations as though fully set forth herein.

426. Defendant reinstated Plaintiffs timely claim of *defamation per se* by posting false and defamatory statements to a new audience on May 14<sup>th</sup>, 2024 including by stating, "Dusty Button is a sexual predator" to any viewer or reader that otherwise may not have seen the original false and defamatory post on May 13<sup>th</sup>, 2021.

427. Plaintiffs' claims of defamation **must be tolled** for the following reasons including but not limited to:

- 1) "*During the pendency of a related lawsuit or arbitration related to the same defamatory statements*" whereas, Defendant's defamatory posts and statements are



at issue in **five other pending lawsuits**<sup>31</sup> and, “*the pendency of a motion to dismiss a related lawsuit may toll the statute of limitations until the motion is resolved*” whereas; Defendant’s motion to dismiss a related lawsuit has been pending since August 24<sup>th</sup>, 2023.

- 2) Threats from a licensed attorney in an attempt to prevent Plaintiffs from seeking recourse against her; such as statements which were made online by Ms. Breshears in 2021 including but not limited to, “*I’m a law student, I know libel and slander and this isn’t it*” and “Not afraid. Not even a little”, later doubling down to prevent Plaintiffs from seeking legal recourse against her by stating on May 27<sup>th</sup>, 2024, including but not limited to, “*This isn’t going to end well for you*” and “*I just want to tell you that it’s gonna be bad if you sue me*”.
- 3) A continuing wrong such as Defendants’ May 14<sup>th</sup>, 2024 reposting the exact same defamatory statements made to a mass audience that she posted in 2021, with the intent to harass Plaintiffs<sup>32</sup> including by posting to a new audience, “PSA: Dusty Button is a sexual predator” and;
- 4) Defendants’ online misconduct, remaining anonymous to avoid consequence and recourse<sup>33</sup>.

428. The unprivileged statements made by Defendant to others about Plaintiffs were false and defamatory.

<sup>31</sup> See Case 1:24-cv-5888 – Button et al v. The New York Times Company et al.; Case 1:24-cv-05026 –JPC Button et al v. Doherty et al; Case 0:24-cv-60911-DSL – Button et al v. McCawley; Case 1:24-cv-00220 – Button et al v. Hickie et al. and Case 2:21-cv-01412-ART-EJY.

<sup>32</sup> If the defamatory statement is part of a continuing wrong, such as a series of false statements or a campaign of defamation, the statute of limitations may be tolled until the wrong ceases. (N.Y. C.P.L.R. § 214-a).

<sup>33</sup> If the defendant fraudulently conceals the defamatory statement, the statute of limitations may be tolled until the plaintiff discovers the truth. (N.Y. C.P.L.R. § 214).

1       429.       The unprivileged statements made by Defendant to others about Plaintiffs  
2       caused complete loss and injury to Plaintiffs business whereas, Plaintiffs have not  
3       worked one single job since May 13<sup>th</sup>, 2021 including that any and all contracts and  
4       agreements were immediately and prematurely terminated following Defendants'  
5       conduct and recently unethical misconduct.  
6

7       430.       Defendant published such statements negligently, with knowledge of the  
8       falsity of the statements, and/or with reckless disregard of their truth or falsity.

9       431.       At the time such statements were made by Defendant, she knew or *should have*  
10       *known* that they were false and defamatory.

11       432.       Hundreds of thousands of people *actually read* and/or heard the false and  
12       defamatory statements.  
13

14       433.       The statements were not privileged.

15       434.       Defendant's statements are so bad they immediately subject a person or a  
16       company to hatred, distrust, ridicule, disgrace and contempt, constituting  
17       defamation *per se*.

18       435.       The statements were published by Defendant with actual malice, oppression,  
19       and/or reckless disregard for the truth in that she was aware at the time of the falsity of  
20       the publication and thus, made said publications in bad faith, out of hatred and ill-will  
21       directed towards Plaintiffs without any regard for the truth.  
22

23       436.       Defendant possessed information and had access to information that showed  
24       their statements were false.

25       437.       Defendant also made statements for which they had no factual basis including  
26       but not limited to by admitting a recorded call that she never spoke to anyone that  
27  
28

1 would be involved in the New York Times article or later, the Nevada litigation aside  
2 from Sage Humphries and her best friend and non-party, Hannah Stolrow, verifying  
3 that there was no truth, evidence or verification to her defamatory allegations.

4 438. Defendant suggested Plaintiffs were involved in a serious crime involving  
5 moral turpitude or a felony, exposing Plaintiffs to ridicule in which reflected  
6 negatively on Plaintiffs' characters, morality and integrity whereas, the defamatory  
7 statements impaired Plaintiffs' financial well-being.

8 439. Moreover, the statements tend to so harm the reputation of Plaintiffs as to  
9 lower their professional reputation in the community or deter third persons from  
10 associating or dealing with them including termination of any and all business,  
11 contracts or employment and, as such, constitute defamation *per se*.

12 440. Defendants made false and defamatory statements to a mass audience in which  
13 were so widely understood to be harmful that they are presumed to be defamatory as  
14 Defendants made statements which accused Plaintiffs of committing crimes against  
15 children, particularly, ("young girls").

16 441. Defendants' defamatory statements were intentionally and specifically timed to  
17 prevent Plaintiffs from seeking recourse against her as Plaintiffs could not afford to  
18 file claims against Defendant, as her defamatory statements *immediately destroyed*  
19 Plaintiffs' ability to work and to generate income; this was an additional and  
20 *intentional act* so that Plaintiffs could not seek recourse against Defendant until now.

21 442. Defendant is equitably estopped from asserting a statute of limitations as a  
22 defense; allowing her to do so would be **unjust**.

23 443. Plaintiffs' statutes, *if any*, **must be tolled**.

1 444. Defendants' statements are not supported by evidence or facts; the Defendant  
2 cannot rely on the truth privilege to defend against the claim.

3 445. Defendant's statements were not that of opinion<sup>34</sup> but rather, a statement of  
4 fact.

5 446. Defendant's statements were made out of *actual malice* because a reasonable  
6 listener or reader would infer that the speaker knows certain facts, unknown to [the]  
7 audience, which support [the] opinion and are detrimental to the person [toward] whom  
8 [the communication is directed], in this case, Plaintiffs; including because Defendant  
9 stated to a mass audience that she had "evidence" and "facts" only to state on the May  
10 27<sup>th</sup>, 2024 phone call that she did not have any evidence or facts to prove her  
11 statements to be true, (they are not), therefore, her statements were made out of *actual*  
12 *malice*.  
13  
14

15 447. Defendant made false and defamatory statements to a mass audience in which  
16 were so widely understood to be harmful that they are presumed to be defamatory as  
17 Defendant made statements which accused Plaintiffs of committing crimes against  
18 children, ("young girls"), accusing Plaintiffs of a serious criminal offense.

19 448. Plaintiffs are entitled to punitive damages, because Defendants' defamatory  
20 statements were made with hatred, ill will, and spite, with the intent to harm Plaintiffs  
21 or in blatant disregard of the substantial likelihood of causing them harm.  
22

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23  
24 <sup>34</sup> Additionally, "A pure opinion may take one of two forms. It may be a statement of opinion which is  
25 accompanied by a recitation of the facts upon which it is based, or it may be [a]n opinion not accompanied by  
26 such a factual recitation so long as it does not imply that it is based upon undisclosed facts." Davis v. Boenheim,  
27 24 NY3d 262, 269 (2014) (internal quotation marks omitted). Conversely, "an opinion that implies that it is  
28 based upon facts which justify the opinion but are unknown to those reading or hearing it, is a mixed opinion and  
is actionable." Id. (alterations and internal quotation marks omitted). The latter is actionable "not because they  
convey false opinions 'but rather because a reasonable listener or reader would infer that the speaker knows  
certain facts, unknown to [the] audience, which support [the] opinion and are detrimental to the person [toward]  
whom [the communication is directed].'" Gross, 82 N.Y.2d at 153-154, quoting Steinhilber, 68 N.Y.2d at 290.

449. As a proximate result of the false and defamatory publication of statements to third parties by Defendant, Plaintiffs have been severely damaged.

450. Because Defendant's defamatory statements constitute intentional acts which were made with actual malice towards Plaintiffs and/or reckless disregard for the truth, Plaintiffs seek an award for punitive damages.

WHEREFORE, Plaintiffs Dusty and Taylor Button demand judgment against Defendant Madison Jane Breshears for damages, punitive damages, court costs, and such other relief as the Court deems just and proper.

### **COUNT III – LIBEL PER SE**

451. Plaintiffs incorporate by reference and reallege the preceding allegations as though fully set forth herein.

452. Defendant reinstated Plaintiffs timely claim of libel *per se* by posting false and defamatory statements to a new audience on May 14<sup>th</sup>, 2024 including by stating, "Dusty Button is a sexual predator" to any viewer or reader that otherwise may not have seen the original false and defamatory post on May 13<sup>th</sup>, 2021.

453. The unprivileged statements made by Defendant to others about Plaintiffs were false and defamatory.

454. Plaintiffs' claims of defamation **must be tolled** for the following reasons including but not limited to:

- 1) *"During the pendency of a related lawsuit or arbitration related to the same defamatory statements"* whereas, Defendant's defamatory posts and statements are at issue in **five other pending lawsuits** and, *"the pendency of a motion to dismiss a related lawsuit may toll the statute of limitations until the motion is*

*resolved*” whereas; Defendant’s motion to dismiss a related lawsuit has been pending since August 24<sup>th</sup>, 2023.

2) Threats from a licensed attorney in an attempt to prevent Plaintiffs from seeking recourse against her; such as statements which were made online by Ms. Breshears in 2021 including but not limited to, “I’m a law student, I know libel and slander and this isn’t it”, later doubling down to prevent Plaintiffs from seeking legal recourse against her by stating on May 27<sup>th</sup>, 2024, including but not limited to, “*This isn’t going to end well for you*” and “*I just want to tell you that it’s gonna be bad if you sue me*”.

3) A continuing wrong such as Defendants’ May 14<sup>th</sup>, 2024 reposting the exact same defamatory statements made to a mass audience that she posted in 2021, with the intent to harass Plaintiffs including by posting to a new audience, “PSA: Dusty Button is a sexual predator” and;

4) Defendants’ online misconduct, remaining anonymous to avoid consequence and recourse.

455. The unprivileged statements made by Defendant to others about Plaintiffs caused complete loss and injury to Plaintiffs business whereas, Plaintiffs have not worked one single job since May 13<sup>th</sup>, 2021 including that any and all contracts and agreements were immediately and prematurely terminated following Defendants’ conduct.

456. Defendant published such statements negligently, with knowledge of the falsity of the statements, and/or with reckless disregard of their truth or falsity.

1 457. At the time such statements were made by Defendant, she knew or should have  
2 known that they were false and defamatory.

3 458. Hundreds of thousands of people *actually read* and/or heard the false and  
4 defamatory statements.

5 459. The statements were not privileged.

6 460. The statements were published and stated by Defendant with *actual malice*,  
7 oppression, and/or reckless disregard for the truth in that they were aware at the time  
8 of the falsity of the publication and thus, made said publications in bad faith, out of  
9 hatred and ill-will directed towards Plaintiffs without any regard for the truth.

10 461. Defendant possessed information and had access to information that showed  
11 her statements were false.

12 462. Defendant also made statements for which they had no factual basis.

13 463. Moreover, the statements tend to so harm the reputation of Plaintiffs as to  
14 lower their professional reputation in the community or deter third persons from  
15 associating or dealing with them including termination of any and all business,  
16 contracts or employment and, as such, constitute libel *per se*<sup>35</sup>.

17 464. As a proximate result of the maliciously false and defamatory publication of  
18 statements to third parties by Defendant, Plaintiffs have been severely damaged.

19 465. Defendant's statements were not that of opinion<sup>36</sup> but rather, a statement of  
20 fact.

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25 <sup>35</sup> "The test to determine whether a statement is substantially true "is whether [the statement] as published would  
26 have a different effect on the mind of the reader from that which the pleaded truth would have  
27 produced." *Fleckenstein v. Friedman*, 266 N.Y. 19, 23 (1934); *Franklin v. Daily Holdings, Inc.*, 135 A.D.3d 87,  
28 94 (1st Dept. 2015).

<sup>36</sup> Additionally, "A pure opinion may take one of two forms. It may be a statement of opinion which is  
accompanied by a recitation of the facts upon which it is based, or it may be [a]n opinion not accompanied by  
such a factual recitation so long as it does not imply that it is based upon undisclosed facts." *Davis v. Boenheim*,



466. Defendant’s statements were made out of *actual malice* because a reasonable listener or reader would infer that the speaker knows certain facts, unknown to [the] audience, which support [the] opinion and are detrimental to the person [toward] whom [the communication is directed], in this case, Plaintiffs; including because Defendant stated to a mass audience that she had “evidence” and “facts” only to state on the May 27<sup>th</sup>, 2024 phone call that she did not have any evidence or facts to prove her statements to be true, (they are not), therefore, her statements were made out of *actual malice*.

467. Defendant made false and defamatory statements to a mass audience in which were so widely understood to be harmful that they are presumed to be defamatory as Defendant made statements which accused Plaintiffs of committing crimes against children, (“young girls”), accusing Plaintiffs of a serious criminal offense.

468. Because Defendant’s defamatory statements constitute intentional acts which were made with actual malice towards Plaintiffs, Plaintiffs seek an award for punitive damages.

WHEREFORE, Plaintiffs Dusty and Taylor Button demand judgment against Defendant Madison Jane Breshears for damages, punitive damages, court costs, and such other relief as the Court deems just and proper.

#### **COUNT IV – SLANDER PER SE**

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24 NY3d 262, 269 (2014) (internal quotation marks omitted). Conversely, “an opinion that implies that it is based upon facts which justify the opinion but are unknown to those reading or hearing it, is a mixed opinion and is actionable.” Id. (alterations and internal quotation marks omitted). The latter is actionable “not because they convey false opinions ‘but rather because a reasonable listener or reader would infer that the speaker knows certain facts, unknown to [the] audience, which support [the] opinion and are detrimental to the person [toward] whom [the communication is directed].’” Gross, 82 N.Y.2d at 153-154, quoting Steinhilber, 68 N.Y.2d at 290.

1       469.       Plaintiffs incorporate by reference and reallege the preceding allegations as  
2       though fully set forth herein.

3       470.       Defendant reinstated Plaintiffs timely claim of Injurious Falsehood by posting  
4       false and defamatory statements to a new audience on May 14<sup>th</sup>, 2024 including by  
5       stating, “Dusty Button is a sexual predator” to any viewer or reader that otherwise may  
6       not have seen the original false and defamatory post on May 13<sup>th</sup>, 2021.

7  
8       471.       Ms. Breshears made statements to multiple third-parties via telephone call and  
9       text message as stated on the telephone call on May 27<sup>th</sup>, 2024 including that she  
10       stated she would have to “go back and look at the messages”, which will be  
11       discoverable upon the continuing process of this litigation, including that she spoke to  
12       non-party co-conspirator Hannah Stolrow about the defamatory allegations listed  
13       herein.

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15       472.       The unprivileged statements made by Defendant to others about Plaintiffs were  
16       false and defamatory.

17       473.       The unprivileged statements made by Defendant to others about Plaintiffs  
18       caused complete loss and injury to Plaintiffs business whereas, Plaintiffs have not  
19       worked one single job since May 13<sup>th</sup>, 2021 including that any and all contracts and  
20       agreements were immediately and prematurely terminated following Defendants’  
21       conduct.

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23       474.       Defendant made defamatory statements to various third parties with  
24       negligence, with knowledge of the falsity of the statements, and/or with reckless  
25       disregard of their truth or falsity.  
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1 475. At the time such statements were made by Defendant, Defendant knew or  
2 should have known that they were false and defamatory.

3 476. Hundreds of thousands of people actually read and/or heard the false and  
4 defamatory statements.

5 477. The statements were not privileged.

6 478. The statements were published by Defendant with actual malice, oppression,  
7 and fraud in that they were aware at the time of the falsity of the publication and thus,  
8 made said publications in bad faith, out of hatred and ill-will directed towards  
9 Plaintiffs without any regard for the truth.

10 479. Defendant possessed information and had access to information that showed  
11 their statements were false.

12 480. Defendant also made statements for which they had no factual basis.

13 481. Defendant intentionally caused harm by telling Defendants' co-workers, clients  
14 and employers these false and defamatory statements as to intentionally inflict harm  
15 on their reputations, careers and business including by making defamatory statements  
16 which accuse Plaintiffs of crimes and other immoral sexual acts.

17 482. Moreover, the statements tend to so harm the reputation of Plaintiffs as to  
18 lower their professional reputation in the community or deter third persons from  
19 associating or dealing with them including termination of any and all business,  
20 contracts or employment and, as such, constitute slander *per se*.

21 483. As a proximate result of the maliciously false and defamatory publication of  
22 statements to third parties by Defendant, Plaintiffs have been severely damaged.  
23  
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1 484. Because Defendant's defamatory statements constitute intentional acts which  
2 were made with actual malice towards Plaintiffs, Plaintiffs seek an award for punitive  
3 damages.

4 WHEREFORE, Plaintiffs Dusty and Taylor Button demand judgment against  
5 Defendant Madison Jane Breshears for damages, punitive damages, court costs, and such  
6 other relief as the Court deems just and proper.  
7

8 **COUNT V – CYBER HARASSMENT**

9 485. Plaintiffs incorporate by reference and reallege the preceding allegations as  
10 though fully set forth herein.

11 486. Defendant communicated with hundreds of thousands of third parties by  
12 transmitting written communication with the intent to harass, annoy, threaten and  
13 alarm Plaintiffs.  
14

15 487. Cyber harassment is considered a form of IIED if it is shown that the  
16 perpetrator engaged in conduct that was intentional, outrageous, and caused severe  
17 emotional distress to Plaintiffs.

18 488. Defendant engaged in such conduct not only in 2021 but on May 14<sup>th</sup>, 2024, by  
19 doxing Plaintiffs' private information online and posting further defamatory  
20 statements with the intent to harass, threaten and harm Plaintiffs, causing extreme  
21 distress to Plaintiffs, who are expecting their first child on August 8<sup>th</sup>, 2024.  
22

23 489. NY Penal Law § 240.30 considers cyber-harassment a crime however, Cyber  
24 harassment is a form of intentional infliction of emotional distress, characterized by  
25 persistent and repeated online behavior aimed at causing severe emotional harm and  
26 fear of physical harm to a specific individual whereas, Defendant intentionally caused  
27  
28

1 severe emotional distress in 2021 and again in 2024 not only by doxing their private  
2 and personal contact information but by publically and maliciously posting the same  
3 defamatory statement to her social media account @real\_world\_ballerina on May 14<sup>th</sup>,  
4 2024 whereas, the intent was to harass Plaintiffs to a new audience, three years later,  
5 stating again that Plaintiff Dusty Button was a sexual predator and then directing her  
6 mass audience of nearly twenty-thousand followers to Plaintiffs contact information,  
7 causing Plaintiffs severe emotional distress.

9 490. The unprivileged statements made by Defendant to others about Plaintiffs were  
10 false, defamatory and fraudulent.

11 491. The unprivileged statements made by Defendant to others about Plaintiffs  
12 caused complete loss and injury to Plaintiffs business whereas, Plaintiffs have not  
13 worked one single job since May 13<sup>th</sup>, 2021 including that any and all contracts and  
14 agreements were immediately and prematurely terminated following Defendants'  
15 conduct.

17 492. Defendant published such statements negligently, with knowledge of the  
18 falsity of the statements, and/or with reckless disregard of their truth or falsity.

19 493. At the time such statements were made by Defendant, she knew or should have  
20 known that they were false and defamatory including by reposting the same  
21 defamatory statement on May 14<sup>th</sup>, 2024, proving that her intent was to harass and  
22 harm Plaintiffs with actual malice and constituting harassment as an underlying claim  
23 for the intentional infliction of emotional distress.

25 494. Hundreds of thousands of people *actually read* and/or heard the false and  
26 defamatory statements, including that they had access to Plaintiff's contact  
27  
28

information following a statement where Defendant made a statement of fact, leading any reasonable reader or viewer to believe Plaintiffs had committed a criminal act.

495. The statements were not privileged.

496. The statements were published by Defendant with *actual malice*, oppression, and/or reckless disregard for the truth, in that they were aware at the time of the falsity of the publication and thus, made said publications in bad faith, out of hatred and ill-will directed towards Plaintiffs without any regard for the truth.

497. Defendant possessed information and had access to information that showed their statements were false.

498. Defendant also made statements for which they had no factual basis.

499. Defendants' defamatory statements resulted in numerous third-party death threats towards Plaintiffs as a direct result of Defendants' conduct causing Plaintiffs extreme fear, anxiety and depression.

500. Moreover, the statements tend to so harm the reputation of Plaintiffs as to lower their professional reputation in the community or deter third persons from associating or dealing with them including termination of any and all business, contracts or employment and, as such, constitute *cyber-harassment*.

501. As a proximate result of the maliciously false and defamatory publication of statements to third parties by Defendant, Plaintiffs have been severely damaged.

502. Because Defendant's defamatory statements constitute intentional acts which were made with actual malice towards Plaintiffs, Plaintiffs seek an award for punitive damages.

1 WHEREFORE, Plaintiffs Dusty and Taylor Button demands judgment against  
2 Defendant Madison Jane Breshears for damages, punitive damages, court costs, and such  
3 other relief as the Court deems just and proper.

4 **COUNT VI - INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS**

5 503. Plaintiffs incorporate by reference and reallege the preceding allegations as  
6 though fully set forth herein.

7  
8 504. Defendant reinstated Plaintiffs timely claim of Intentional Infliction of  
9 Emotional Distress by posting false and defamatory statements to a new audience on  
10 May 14<sup>th</sup>, 2024 including by stating, “Dusty Button is a sexual predator” to any viewer  
11 or reader that otherwise may not have seen the original false and defamatory post on  
12 May 13<sup>th</sup>, 2021 and including by doxing their private contact information to a mass  
13 audience on May 14<sup>th</sup>, 2024.

14  
15 505. Defendant engaged in extreme and outrageous conduct with the intention of  
16 causing Plaintiffs severe emotional distress by first making false, derogatory,  
17 defamatory and fraudulent statements of fact to a mass audience about Plaintiffs.

18 506. At the time of the events herein and at the time Ms. Breshears’ posts were  
19 published, Plaintiffs received innumerable messages and phone calls regarding the  
20 defamatory posts which were disclosed to a mass audience *prior* to Plaintiffs being  
21 having any idea of what Defendant was referring to, while teaching for thousands of  
22 children at the time the post was made and published.

23  
24 507. Plaintiffs were notified by various third-parties about the post, resulting in  
25 extreme distress.



1 508. Plaintiffs' attorney could not even comment on the article appropriately as he  
2 was unaware of what was written in the complaint.

3 509. The unprivileged statements made by Defendant to others about Plaintiffs were  
4 false and defamatory in nature including that Defendant has admitted that she only  
5 posted the defamatory statements because she did not know Plaintiffs "*were going to*  
6 *sue her*".  
7

8 510. The unprivileged statements made by Defendant to others about Plaintiffs  
9 caused complete loss and injury to Plaintiffs business whereas, Plaintiffs have not  
10 worked one single job since May 13<sup>th</sup>, 2021 including that any and all contracts and  
11 agreements were immediately and prematurely terminated following Defendants'  
12 conduct.  
13

14 511. Defendant published such statements negligently, with knowledge of the  
15 falsity of the statements, and/or with reckless disregard of their truth or falsity.

16 512. At the time such statements were made by Defendant, Defendant knew or  
17 should have known that they were false and defamatory.

18 513. Hundreds of thousands of people actually read and/or heard the false and  
19 defamatory statements.  
20

21 514. The unprivileged statements made by Defendants to others about Plaintiffs  
22 were false and defamatory and caused extreme distress on Plaintiffs and their family  
23 including that Plaintiffs became depressed and began having suicidal thoughts due to  
24 the shock of Ms. Jacobs' defamatory article as Defendants conspired to intentionally  
25 harm Plaintiffs.  
26  
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1        515.        Plaintiffs could not afford therapy for the trauma endured following Ms.  
2        Breshears' posts as her false and defamatory statements deprived Plaintiffs of the  
3        ability to seek help for the suicidal thoughts which followed in the aftermath of  
4        Defendant's conduct.

5        516.        The statements were not privileged.

6        517.        The statements were published by Defendant with actual malice, oppression,  
7        and fraud in that they were aware at the time of the falsity of the publication and thus,  
8        made said publications in bad faith, out of hatred and ill-will directed towards  
9        Plaintiffs without any regard for the truth.

10       518.       Defendant possessed information and had access to information that showed  
11       their statements were false.

12       519.       Defendant also made statements for which they had no factual basis including  
13       because Defendant stated on May 27<sup>th</sup>, 2024 that she posted her false and defamatory  
14       statements "when the #metoo movement came out" and thinks, "it went too far"  
15       including because she admittedly did not speak to anyone in the litigation which was  
16       filed three months after her defamatory posts were made.

17       520.       Defendant willfully and intentionally posted the same false and defamatory  
18       statement on her social media account @real\_world\_ballerina on May 14<sup>th</sup>, 2024 with  
19       the intent to harass and defame Plaintiffs, again; causing sever anxiety and emotional  
20       distress.

21       521.       Defendants acted intentionally and/or recklessly whereas, the Defendant's  
22       conduct was extreme and outrageous and was the direct cause of Plaintiff's severe  
23       emotional distress in which Plaintiffs continue to suffer today.

522. Moreover, the statements and publication prior to the service of the complaint on Plaintiffs tend to so harm the reputation of Plaintiffs as to lower their professional reputation in the community or deter third persons from associating or dealing with them including termination of any and all business, contracts or employment and, as such, constitutes *intentional infliction of emotional distress*.

523. Plaintiffs' claims of intentional infliction of emotional distress are timely as Madison Breshears intentionally inflicted emotional distress on Plaintiffs on May 14<sup>th</sup>, 2024; however, in the event the statutes of limitation apply to May 13<sup>th</sup>, 2021, Plaintiffs claims **must be tolled** for the following reasons including but not limited to:

- 1) *"During the pendency of a related lawsuit or arbitration related to the same defamatory statements"* whereas, Defendant's defamatory posts and statements are at issue in **five other pending lawsuits** and, *"the pendency of a motion to dismiss a related lawsuit may toll the statute of limitations until the motion is resolved"* whereas; Defendant's motion to dismiss a related lawsuit has been pending since August 24<sup>th</sup>, 2023.
- 2) Threats from a licensed attorney in an attempt to prevent Plaintiffs from seeking recourse against her; such as statements which were made online by Ms. Breshears in 2021 including but not limited to, "I'm a law student, I know libel and slander and this isn't it", later doubling down to prevent Plaintiffs from seeking legal recourse against her by stating on May 27<sup>th</sup>, 2024, including but not limited to, *"This isn't going to end well for you"* and *"I just want to tell you that it's gonna be bad if you sue me"*.

- 3) A continuing wrong such as Defendants' May 14<sup>th</sup>, 2024 reposting the exact same defamatory statements made to a mass audience that she posted in 2021, with the intent to harass Plaintiffs including by posting to a new audience, "PSA: Dusty Button is a sexual predator" and;
- 4) Defendants' online misconduct, remaining anonymous to avoid consequence and recourse.

524. Defendant intentionally abused her power as an attorney and used intimidation tactics to deter Plaintiffs from seeking legal recourse against her including but not limited to by stating that, "*this will not end well for [Plaintiffs]*" and "*it's a waste of your time*", leading them to believe they could not seek legal recourse against her.

525. As a direct and proximate result of the maliciously false and defamatory publication of statements to third parties by Defendant, Plaintiffs have been severely damaged.

526. Because Defendant's defamatory statements constitute intentional acts which were made with *actual malice* towards Plaintiffs, Plaintiffs seek an award for punitive damages.

WHEREFORE, Plaintiffs Dusty and Taylor Button demand judgment against Defendant Madison Jane Breshears for damages, punitive damages, court costs, and such other relief as the Court deems just and proper.

### **COUNT VII – PRIMA FACIE DEFAMATION**

527. Plaintiffs incorporate by reference and reallege the preceding allegations as though fully set forth herein.

528. Plaintiffs claim of Prima Facie Defamation is appropriate as

- 1) a false statement was made purporting to be fact;
- 2) publication or communication of that statement was made to a third person;
- 3) the fault amounted to at least negligence; and
- 4) damages, or some harm caused to the reputation of the person or entity who is the subject.

529. Plaintiffs' claims of prima face defamation are timely as Defendant posted a false a defamatory statement about Plaintiffs on May 14<sup>th</sup>, 2024; however, in the event the statutes of limitation apply to May 13<sup>th</sup>, 2021, Plaintiffs claims **must be tolled** for the following reasons including but not limited to:

- 5) *"During the pendency of a related lawsuit or arbitration related to the same defamatory statements"* whereas, Defendant's defamatory posts and statements are at issue in **five other pending lawsuits** and, *"the pendency of a motion to dismiss a related lawsuit may toll the statute of limitations until the motion is resolved"* whereas; Defendant's motion to dismiss a related lawsuit has been pending since August 24<sup>th</sup>, 2023.
- 6) Threats from a licensed attorney in an attempt to prevent Plaintiffs from seeking recourse against her; such as statements which were made online by Ms. Breshears in 2021 including but not limited to, "I'm a law student, I know libel and slander and this isn't it", later doubling down to prevent Plaintiffs from seeking legal recourse against her by stating on May 27<sup>th</sup>, 2024, including but not limited to, *"This isn't going to end well for you"* and *"I just want to tell you that it's gonna be bad if you sue me"*.

- 1           7) A continuing wrong such as Defendants’ May 14<sup>th</sup>, 2024 reposting the exact  
2           same defamatory statements made to a mass audience that she posted in 2021,  
3           with the intent to harass Plaintiffs including by posting to a new audience,  
4           “PSA: Dusty Button is a sexual predator” and;  
5  
6           8) Defendants’ online misconduct, remaining anonymous to avoid consequence  
7           and recourse.

8       530.       Defendant’s conduct caused special damages including but not limited to  
9       Plaintiff Dusty Button’s contracts with Artists Simply Human, The Dallas  
10       Conservatory, West Coast Dance Elite, Tiger Friday and other various dance studios  
11       and summer intensives, whereas financial records for each can be provided to the  
12       Court with the specified amounts to be stated within the records as a direct cause of  
13       Madison Breshears’ conduct and defamatory posts.  
14

15       531.       Defendant posted the false and defamatory statements with actual malice,  
16       including because she admitted that she never spoke to any party in the lawsuit which  
17       followed her defamatory posts three months later, and admittedly wanted to post the  
18       story prior to the New York Times article being published.  
19

20       532.       The unprivileged statements made by Defendant to others about Plaintiffs were  
21       false and defamatory.

22       533.       The unprivileged statements made by Defendant to others about Plaintiffs  
23       caused complete loss and injury to Plaintiffs business whereas, Plaintiffs have not  
24       worked one single job since May 13<sup>th</sup>, 2021 including that any and all contracts and  
25       agreements were immediately and prematurely terminated following Defendants’  
26       conduct.  
27  
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534. Defendant published such statements negligently, with knowledge of the falsity of the statements, and/or with reckless disregard of their truth or falsity.

535. At the time such statements were made by Defendant, Defendant knew or should have known that they were false and defamatory.

536. Hundreds of thousands of people actually read and/or heard the false and defamatory statements.

537. The statements were not privileged.

538. The statements were published by Defendant with actual malice, oppression, and fraud in that they were aware at the time of the falsity of the publication and thus, made said publications in bad faith, out of hatred and ill-will directed towards Plaintiffs without any regard for the truth.

539. Defendant possessed information and had access to information that showed their statements were false.

540. Defendant also made statements for which they had no factual basis.

541. Defendant made intentionally false statements purporting to be fact, published and communicated those statements hundreds of thousands of third parties faulting to, at the very least, negligence, whereas, the damages and harm to Plaintiffs and their reputations is irreparable as a direct result of the defamatory statements made by Madison Breshears.

542. Moreover, the statements tend to so harm the reputation of Plaintiffs as to lower their professional reputation in the community or deter third persons from associating or dealing with them including termination of any and all business, contracts or employment and, as such, constitutes *Prima Facie Defamation*.



543. As a proximate result of the maliciously false and defamatory publication of statements to third parties by Defendant, Plaintiffs have been severely damaged.

544. Because Defendant's defamatory statements constitute intentional acts which were made with actual malice towards Plaintiffs, Plaintiffs seek an award for punitive damages.

WHEREFORE, Plaintiffs Dusty and Taylor Button demand judgment against Defendant Madison Jane Breshears for damages, court costs, and such other relief as the Court deems just and proper.

### **COUNT VIII – CIVIL CONSPIRACY**

545. Plaintiffs incorporate by reference and reallege the preceding allegations as though fully set forth herein.

546. Defendant with others including but not limited to Sage Humphries, Hannah Stolrow, Julia Jacobs and Sigrid McCawley<sup>37</sup> as she admitted she knew of the New York Times article *months prior* to the article being published, (parties including the media and attorneys), and colluded to commit an unlawful and unethical act such as defamation and invasion of Plaintiffs' privacy in order to coordinate coverage and mutual influence to cripple Plaintiffs' defense and destroy Plaintiffs' right to due process including but not limited to publishing and disclosing a lawsuit prior to even serving the complaint on Plaintiffs.

547. Defendant colluded with others to gain an advantage, preventing Plaintiffs from seeking recourse until now, while unethically playing to the media to cripple Plaintiffs defense against the lawsuit which would be filed three months following

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<sup>37</sup> Plaintiffs have filed a defamation lawsuit against Sigrid McCawley for statements made in the media that are not privileged in the Southern District Court of Florida – see case 0:24-cv-60911-DSL.

1 Defendant's false and defamatory posts which was not only false and defamatory but  
2 additionally, in no way similar to the New York Times article, as the only person  
3 interviewed that Plaintiff Dusty Button knew was Sage Humphries, who was not a  
4 child or a "young girl" at the time Plaintiffs were in a dating relationship with her,  
5 which is explicitly what Defendant posted on her account proving her statements made  
6 were out of *actual malice*, leading any reader or viewer to believe an entirely different  
7 narrative as admitted by Defendant on May 27<sup>th</sup>, 2024, admitted Sage Humphries was  
8 not a child in 2017.  
9

10 548. The unprivileged statements made by Defendant to others about Plaintiffs were  
11 false and defamatory.  
12

13 549. The unprivileged statements made by Defendant to others about Plaintiffs  
14 caused complete loss and injury to Plaintiffs business whereas, Plaintiffs have not  
15 worked one single job since May 13<sup>th</sup>, 2021 including that any and all contracts and  
16 agreements were immediately and prematurely terminated following Defendants'  
17 conduct.  
18

19 550. Defendant published such statements negligently, with knowledge of the  
20 falsity of the statements, and/or with reckless disregard of their truth or falsity.  
21

22 551. At the time such statements were made by Defendant, Defendant knew or  
23 should have known that they were false and defamatory.  
24

25 552. Hundreds of thousands of people actually read and/or heard the false and  
26 defamatory statements.  
27

28 553. The statements were not privileged.

1 554. The statements were published by Defendant with actual malice, oppression,  
2 and fraud in that they were aware at the time of the falsity of the publication and thus,  
3 made said publications in bad faith, out of hatred and ill-will directed towards  
4 Plaintiffs without any regard for the truth.

5 555. Defendant possessed information and had access to information that showed  
6 their statements were false.

7 556. Defendant also made statements for which they had no factual basis.

8 557. Defendant made an express agreement, as admitted on the May 27<sup>th</sup>, 2024  
9 phone call with another, including but not limited to Sage Humphries, Micah and  
10 Michael Humphries, and/or Hannah Stolrow, to commit a wrong whereas, Defendant  
11 conspired to cyber-harass, bully, threaten and defame Plaintiffs in a joint effort to  
12 destroy their business, reputations, careers, ability to work and financial ability to  
13 defend prior to Sage Humphries' lawsuit which was filed three months after Madison  
14 Breshears posted her defamatory statements to intentionally deprive Plaintiffs in an  
15 Overt Act in Furtherance causing economic loss.

16 558. Defendants' actions resulted in "Unfair Competition" by way of coordinating  
17 efforts to spread false information about Plaintiffs, (whose names and likeness were  
18 their business), to gain an advantage, months prior to Sage Humphries filing her civil  
19 litigation which Defendant admittedly, did not even know was imminent, as to destroy  
20 Plaintiffs' reputations, careers, business, ability to work and defend themselves against  
21 the defamatory statements and litigation itself.

22 559. Plaintiff's claims **must be tolled** for the following reasons including but not  
23 limited to:  
24

1) “During the pendency of a related lawsuit or arbitration related to the same defamatory statements” whereas, Defendant’s defamatory posts and statements are at issue in **five other pending lawsuits** and, “the pendency of a motion to dismiss a related lawsuit may toll the statute of limitations until the motion is resolved” whereas; Defendant’s motion to dismiss a related lawsuit has been pending since August 24<sup>th</sup>, 2023.

2) Threats from a licensed attorney in an attempt to prevent Plaintiffs from seeking recourse against her; such as statements which were made online by Ms. Breshears in 2021 including but not limited to, “I’m a law student, I know libel and slander and this isn’t it”, later doubling down to prevent Plaintiffs from seeking legal recourse against her by stating on May 27<sup>th</sup>, 2024, including but not limited to, “*This isn’t going to end well for you*” and “*I just want to tell you that it’s gonna be bad if you sue me*”.

3) A continuing wrong such as Defendants’ May 14<sup>th</sup>, 2024 reposting the exact same defamatory statements made to a mass audience that she posted in 2021, with the intent to harass Plaintiffs including by posting to a new audience, “PSA: Dusty Button is a sexual predator” and;

4) Defendants’ online misconduct, remaining anonymous to avoid consequence and recourse.

560. Defendants’ actions were unlawful including that the defamatory statements made and published were intentional and wrongful interferences with Plaintiffs’ business relationships.

1 561. Defendants proof of conspiracy lies within their pattern to continue conspiring  
2 and unethically colluding with the media to gain an unlawful advantage.

3 562. Plaintiffs are entitled to punitive damages because Defendants' defamatory  
4 statements were made with hatred, ill will, and spite, with the intent to harm Plaintiffs  
5 or in blatant disregard of the substantial likelihood of causing them harm and because  
6 Defendants' conduct constitutes intentional acts of conspiracy which were made with  
7 actual malice towards Plaintiffs whereas, the conduct is part of a pattern of similar  
8 conduct directed at the public generally, indicating a reckless disregard for civil  
9 obligations, Plaintiffs seek an award for punitive damages.  
10

11 563. Moreover, the statements tend to so harm the reputation of Plaintiffs as to  
12 lower their professional reputation in the community or deter third persons from  
13 associating or dealing with them including termination of any and all business,  
14 contracts or employment and, as such, constitute *Civil Conspiracy*.  
15

16 564. As a proximate result of the maliciously false and defamatory publication of  
17 statements to third parties by Defendant, Plaintiffs have been severely damaged.

18 WHEREFORE, Plaintiffs Dusty and Taylor Button demand judgment against  
19 Defendant Madison Jane Breshears for damages, punitive damages, court costs, and such  
20 other relief as the Court deems just and proper.  
21

22 **COUNT IX – DEFAMATION PER QUOD**

23 565. Plaintiffs incorporate by reference and reallege the preceding allegations as  
24 though fully set forth herein.

25 566. Defendant posted her defamatory statements knowing that Plaintiff Taylor  
26 Button was not a dance teacher but intentionally led any reader or viewer to believe  
27  
28

1 that he was including by admitting on the May 27<sup>th</sup>, 2024 phone call that she knew he  
2 was not a dance teacher.

3 567. Defendant intentionally misled viewers and any reader to believe that  
4 Plaintiffs, together, were dance teachers who “lured” their students into sex acts with  
5 them which would otherwise be seen in a different light should the truth have been  
6 posted such as, Plaintiff Dusty Button was a profession ballet dancer and Plaintiff  
7 Taylor Button was a car designer, neither working in the same industry, readers would  
8 not have been led to believe that any “minor” or “child” was lured in by Dusty to have  
9 sex acts with Taylor including because the four women who allege they were minors  
10 have never met Dusty and therefore, could not have been “lured”.  
11

12 568. Plaintiffs have never met Jane Doe 1 and Ms. Breshears admittedly did not  
13 know her and in fact, lied, by stating she spoke to the New York Times as she did not;  
14 additionally, Ms. Breshears cannot, by Court Order in Nevada, see or know the  
15 identity or statements made by Jane Doe 1 per the protective order and sealed  
16 documents in the case, though the statements made after Ms. Breshears’ post are  
17 irrelevant and do not support her false and defamatory statements made three months  
18 prior to the New York Times article being published and five months prior to Jane  
19 Doe 1 entering the case after reading the New York Times article, verifying that she  
20 could not have possibly spoken the New York Times, discounting Ms. Breshears  
21 statements in their entirety.  
22

23 569. Ms. Breshears knew that her statements would or could, at the very least be  
24 taken out of context including because she admittedly stated on the May 27<sup>th</sup>, 2024  
25 phone call, *“So the evidence is that there are over 5 people who claimed that this*  
26  
27  
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1        *happened to them right? If they had evidence this wouldn't be a civil case right? If*  
2        *they had evidence this would be a criminal case",* proving that she in fact, had no  
3        evidence to support her false and defamatory statements prior to posting, in addition to  
4        the forementioned statements in this complaint proving she knew her statements were  
5        false and defamatory and made with *actual malice*.

6  
7        570.        The unprivileged statements made by Defendant to others about Plaintiffs were  
8        false and defamatory.

9        571.        The unprivileged statements made by Defendant to others about Plaintiffs  
10       caused complete loss and injury to Plaintiffs business whereas, Plaintiffs have not  
11       worked one single job since May 13<sup>th</sup>, 2021 including that any and all contracts and  
12       agreements were immediately and prematurely terminated following Defendants'  
13       conduct.

14  
15       572.        Defendant published such statements negligently, with knowledge of the  
16       falsity of the statements, and/or with reckless disregard of their truth or falsity.

17       573.        At the time such statements were made by Defendant, Defendant knew or  
18       should have known that they were false and defamatory.

19       574.        Defendant's conduct and defamatory statements caused special damages  
20       including but not limited to Plaintiff Dusty Button's contracts with Artists Simply  
21       Human, The Dallas Conservatory, West Coast Dance Elite, Tiger Friday and other  
22       various dance studios and summer intensives, whereas financial records for each can  
23       be provided to the Court with the specified amounts to be stated within the records as  
24       a direct cause of Madison Breshears' conduct and defamatory posts.  
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1 575. Hundreds of thousands of people actually read and/or heard the false and  
2 defamatory statements.

3 576. The statements were not privileged.

4 577. The statements were published by Defendant with actual malice, oppression,  
5 and fraud in that they were aware at the time of the falsity of the publication and thus,  
6 made said publications in bad faith, out of hatred and ill-will directed towards  
7 Plaintiffs without any regard for the truth.

8 578. Defendant possessed information and had access to information that showed  
9 their statements were false.

10 579. Defendant is equitably estopped from asserting a statute of limitations as a  
11 defense; allowing Defendant to do so would be **unjust**.

12 580. Plaintiff's claims **must be tolled** for the following reasons including but not  
13 limited to:

14 1) *"During the pendency of a related lawsuit or arbitration related to the same*  
15 *defamatory statements"* whereas, Defendant's defamatory posts and statements  
16 are at issue in **five other pending lawsuits** and, *"the pendency of a motion to*  
17 *dismiss a related lawsuit may toll the statute of limitations until the motion is*  
18 *resolved"* whereas; Defendant's motion to dismiss a related lawsuit has been  
19 pending since August 24<sup>th</sup>, 2023.

20 2) Threats from a licensed attorney in an attempt to prevent Plaintiffs from  
21 seeking recourse against her; such as statements which were made online by  
22 Ms. Breshears in 2021 including but not limited to, "I'm a law student, I know  
23 libel and slander and this isn't it", later doubling down to prevent Plaintiffs  
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from seeking legal recourse against her by stating on May 27<sup>th</sup>, 2024, including but not limited to, “*This isn’t going to end well for you*” and “*I just want to tell you that it’s gonna be bad if you sue me*”.

- 3) A continuing wrong such as Defendants’ May 14<sup>th</sup>, 2024 reposting the exact same defamatory statements made to a mass audience that she posted in 2021, with the intent to harass Plaintiffs including by posting to a new audience, “PSA: Dusty Button is a sexual predator” and;
- 4) Defendants’ online misconduct, remaining anonymous to avoid consequence and recourse.

581. Defendant also made statements for which they had no factual basis.

582. Moreover, the statements tend to so harm the reputation of Plaintiffs as to lower their professional reputation in the community or deter third persons from associating or dealing with them including termination of any and all business, contracts or employment and, as such, constitutes *Defamation Per Quod*.

583. As a proximate result of the maliciously false and defamatory publication of statements to third parties by Defendant, Plaintiffs have been severely damaged.

584. Because Defendant’s defamatory statements constitute intentional acts which were made with actual malice towards Plaintiffs, Plaintiffs seek an award for punitive damages.

WHEREFORE, Plaintiffs Dusty and Taylor Button demand judgment against Defendant Madison Jane Breshears for damages, punitive damages, court costs, and such other relief as the Court deems just and proper.

#### **COUNT X -TORTIOUS INTERFERENCE WITH BUSINESS RELATIONS**

1 585. Plaintiffs incorporate by reference and reallege the preceding allegations as  
2 though fully set forth herein.

3 586. Plaintiffs claim of tortious interference is timely per New York law which  
4 allows three years from the time of injury to file a complaint.

5 587. The unprivileged statements made by Defendant were false and defamatory.

6 588. The unprivileged statements made by Defendants to others about Plaintiffs  
7 caused complete loss and injury to Plaintiffs' businesses whereas, Plaintiffs have not  
8 worked one single job since May 13<sup>th</sup>, 2021 including that any and all contracts and  
9 agreements were immediately and prematurely terminated following Defendant's  
10 conduct and the publishing of Ms. Breshears' defamatory posts.

11 589. Defendants made and published such statements negligently, with knowledge  
12 of the falsity of the statements, and/or with reckless disregard of their truth or falsity.

13 590. At the time Defendant made and published such statements, she knew or  
14 should have known that they were false and defamatory.

15 591. Hundreds of thousands of people *actually* read and/or heard the false and  
16 defamatory statements.

17 592. Defendants' statements were not privileged.

18 593. Defendant conspired and colluded to interfere with Plaintiffs' businesses,  
19 contractual agreements, relationships, sponsors, employers, business affiliates,  
20 reputations and business agreements in order to cripple Plaintiffs' defense against a  
21 New York Times article and a lawsuit which she knew of prior to Plaintiffs having any  
22 knowledge of and which was publicly disclosed prior to Plaintiffs ever being served  
23 with that lawsuit or having knowledge of the allegations set forth within the lawsuit.  
24  
25  
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28

1       594. Defendant participated in attorney-media collusion and interference,  
2       compromising the fairness and integrity of the lawsuit which Plaintiffs were not yet  
3       served with and thereby, strategically disrupting the normal course of litigation and  
4       intentionally causing extreme harm to Plaintiffs including by influencing public  
5       perception and any potential juror prior to Plaintiffs having the ability to prepare a  
6       defense.  
7

8       595. Defendants possessed information and had access to information which  
9       showed that the statements within the lawsuit and later, the article were false but for  
10      which she posted her own false and defamatory statements.  
11

12      596. Defendant made statements for which they had no factual basis.

13      597. Defendant suggested Plaintiffs were involved in a serious crime involving  
14      moral turpitude or a felony, exposing Plaintiffs to ridicule in which reflected  
15      negatively on Plaintiffs' characters, morality and integrity whereas, the defamatory  
16      statements impaired Plaintiffs' financial well-being including by publishing those  
17      suggested statements prior to Plaintiffs ever being served.  
18

19      598. The Defendant *intentionally* induced innumerable third parties to break their  
20      contracts with Plaintiffs including because Madison Breshears' posts intentionally  
21      interfered with the Plaintiffs' ability to defend themselves or settle the lawsuit which  
22      came after and therefore, Defendant's actions constitute a tortious interference with  
23      Plaintiffs' legal rights including but not limited to Madison Breshears' statements  
24      made on the May 27<sup>th</sup>, 2024 phone call including that she knew Plaintiff Dusty Button  
25      would be teaching at summer intensives and wanted to cancel her contracts before the  
26      summer months.  
27  
28

1 599. Defendant did so without justification as there was no self-interest in Plaintiffs'  
2 contractual agreements other than to destroy Plaintiffs ability to rightfully defend  
3 themselves.

4 600. Defendants' false statements accused Plaintiffs of a serious crime and  
5 maligned Plaintiffs in their professions, those statements which resulted in constitute a  
6 tortious interference and Plaintiffs' injuries are presumed.

7 601. Defendants' actions were motivated by a desire to harm the Plaintiffs.

8 602. Moreover, the statements tend to so harm the reputation of Plaintiffs as to  
9 lower their professional reputation in the community or deter third persons from  
10 associating or dealing with them including termination of any and all business,  
11 contracts or employment, inducing third-parties through mass media publication to  
12 sever contractual agreements and disassociate from Plaintiffs, preventing Plaintiffs  
13 from a rightful defense against the lawsuit including prior to Plaintiffs being served.

14 603. As a direct and proximate result of the false and defamatory publication,  
15 intentional collusion with the media and disclosure of a lawsuit prior to service being  
16 completed including publication of false statements to a mass media audience and  
17 innumerable third parties by way of mass distribution, Plaintiffs have been severely  
18 damaged.

19 604. Defendants' defamatory statements were intentionally and specifically timed to  
20 induce third-parties into severing any and all contracts with Plaintiffs and  
21 disassociating from Plaintiffs to harass and prevent Plaintiffs from seeking recourse  
22 against Defendants; Plaintiffs could not afford to file claims against Defendants, as  
23  
24  
25  
26  
27  
28

1 their defamatory statements *immediately* destroyed Plaintiffs’ ability to work and to  
2 generate income, disseminating any and all contractual agreements with third-parties.

3 605. Defendant is equitably estopped from asserting a statute of limitations as a  
4 defense and allowing her to do so would be **unjust**.

5 606. Plaintiffs’ statutes, if any, must be tolled.

6 607. Plaintiffs have actual knowledge that substantial additional evidentiary  
7 support, which is in the exclusive possession of Madison Breshears and their agents  
8 and other third-parties, will exist for the allegations and claims set forth above after a  
9 reasonable opportunity for discovery including but not limited to because she stated on  
10 the May 27<sup>th</sup>, 2024 phone call that she would “have to look back at the texts” and that  
11 she “received many messages from other people”.  
12

13 608. Plaintiffs are entitled to punitive damages, because Defendants’ defamatory  
14 statements were made with hatred, ill will, and spite, with the intent to harm Plaintiffs  
15 or in blatant disregard of the substantial likelihood of causing them harm as there was  
16 publicly available information and data including information, data and documentation  
17 proving Defendant’s statements to be false and defamatory.  
18

19 609. Because Ms. Breshears’ defamatory statements constitute intentional acts  
20 which were made with actual malice towards Plaintiffs and or reckless disregard for  
21 the truth, Plaintiffs seek an award for punitive damages.  
22

23 610. WHEREFORE, Plaintiffs Dusty and Taylor Button demand judgment against  
24 Defendants for damages, punitive damages, court costs, and such other relief as the  
25 Court deems just and proper.

26 611.  
27  
28

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request judgment against Defendant, awarding compensatory, consequential, exemplary, and punitive damages in an amount to be determined at trial, including but not limited to:

- A. Entering judgment against the Defendant on all claims made against her in this Complaint;
- B. Entering an Order directing that Defendant pay Plaintiffs reasonable fees and costs pursuant to any applicable law;
- C. For actual damages in an amount to be proven at trial;
- D. For punitive damages in an amount to be proven at trial;
- E. For costs of suit;
- F. For pre-judgment and post-judgment interest on the foregoing sums;
- G. For such other and further relief as the Court deems proper.

**DEMAND FOR JURY TRIAL**

Pursuant to Federal Rule of Civil Procedure 38, Plaintiffs hereby request a trial by jury on all causes of action asserted within this pleading.

Respectfully dated this 4<sup>th</sup> day of August, 2024,

  
\_\_\_\_\_  
Dusty Button and Mitchell Taylor Button (*Pro se*)  
101 Ocean Sands Ct.  
Myrtle Beach, SC 29579  
Email: [Prosecanyousee@malifence.com](mailto:Prosecanyousee@malifence.com)  
Phone: 310-499-8930  
Phone: 310-499-8702



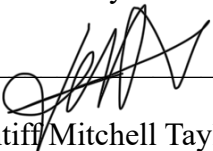
**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed with  
[Pro\\_Se\\_Filing@nysd.uscourts.gov](mailto:Pro_Se_Filing@nysd.uscourts.gov) on August 4<sup>th</sup>, 2024.

Dated this 4<sup>th</sup> day of August 2024,

/s/  \_\_\_\_\_

Signature of Plaintiff Dusty Button (*Pro se*)

/s/  \_\_\_\_\_

Signature of Plaintiff Mitchell Taylor Button (*Pro se*)

## APPENDIX OF EXHIBITS

1. Attached hereto as Exhibit A is a true and correct copy of the May 28<sup>th</sup>, 2017 Orange County Sheriff's Department report filed by Sage Humphries' father where Sage Humphries stated there was no validity to his statements.
2. Attached hereto as Exhibit B is a true and correct copy of the July 22<sup>nd</sup>, 2017 Orange County Sheriff's Department report filed by Sage Humphries and her parents whereas; the report was unfounded based on her interview and the viewed text messages from Sage Humphries to Plaintiffs.
3. Attached hereto as Exhibit C is a true and correct copy of text messages between Sage Humphries and her mother as stated in the complaint from 2017.
4. Attached hereto as Exhibit D are true and correct copies of various text messages and messages through Snapchat from Sage Humphries during the course of their relationship in 2017 and during the events which took place in 2017.
5. Attached hereto as Exhibit E is a true and correct copy of messages sent to Plaintiffs by Sage Humphries regarding a "fake break up" in 2017.

6. Attached hereto as Exhibit F is a true and correct copy of text messages between Sage Humphries and Plaintiffs in 2017.
7. Attached hereto as Exhibit G is a true and correct copy of the Order of the Nevada District Court denying Sage Humphries' Motion to Dismiss Plaintiffs Counterclaim of Defamation against her on February 2<sup>nd</sup>, 2023.
8. Attached hereto as Exhibit H is a true and correct copy of text messages between Sage Humphries and Plaintiffs in 2017.
9. Attached hereto as Exhibit I is a true and correct copy of a letter sent from Plaintiffs previous attorney, Marc Randazza to Daryl Katz' attorney regarding the text messages expose Defendants' friend Sage Humphries and billionaire Daryl Katz, (owner of the Edmonton Oilers NHL team), for the illegal prostitution that the Nevada litigation was initiated to cover up as well as Plaintiffs' declarations of support from the Nevada District Court – case 2:21-cv-01412-ART-EJY.
10. Attached hereto as Exhibit J is a true and correct copy of Defendants' post with non-party co-conspirator Hannah Stolrow on her anonymous account @real\_world\_ballerina.
11. Attached hereto as Exhibit K is a true and correct copy of a message sent from Sage Humphries to Plaintiffs in 2017.

12. Attached hereto as Exhibit L is a true and correct copy of a police report filed with the [REDACTED] Police Department by Plaintiffs against Jane Doe after reaching out to law enforcement for help, as they have never met Jane Doe 1.
13. Attached hereto as Exhibit M is a true and correct copy of various text messages sent to Plaintiffs by Sage Humphries in 2017 via Snapchat.

# EXHIBIT A

9/13/2023	Orange County Sheriff Department	11:33:44AM
<b>Call Detail Information Report</b>		
Call Number: 170528-0691		

Call Number	170528-0691
-------------	-------------

**Call Detail Information**

<b>Call Number</b>	<b>Class</b>	<b>Taker</b>	<b>Pos</b>	<b>Call Owner</b>	<b>Date - Time Received</b>	<b>Cat</b>			
170528-0691	G	ROSECL	10		05/28/2017 18:28:29	0			
<b>Complaint</b>			<b>Ten Code</b>	<b>Priority</b>	<b>Disp Zone</b>	<b>IRA</b>	<b>How Received</b>		
415F DISTURBANCE-FAMILY DISPUTE				2	NO	RO01	WIRE		
<b>Incident Location</b>			<b>Apt/Suite</b>	<b>Floor/Bldg</b>	<b>Incident City</b>	<b>Grid</b>			
11340 WEMBLEY RD					RO	796H3			
<b>Caller Name</b>		<b>Patrol Zone</b>	<b>Telephone</b>		<b>Tower ID</b>	<b>Jurisdiction</b>	<b>Tract</b>		
HUMPHRIES, MICHAEL		06	562-756-2693		949-511-0580	OCSD	RO		
<input type="checkbox"/> Images	<input type="checkbox"/> Medical	<input type="checkbox"/> Hazard	<input checked="" type="checkbox"/> Previous		<input type="checkbox"/> DR Issued in Error				
<b>ALI Time</b>	<b>Call Rec'd</b>	<b>Xmit</b>	<b>Dispatch</b>	<b>Enroute</b>	<b>OnScene</b>	<b>Departed</b>	<b>Arrived</b>	<b>Comp</b>	<b>Unit</b>
18:28:18	18:28:29	18:30:36	18:30:50	18:30:50	18:46:04		19:20:26	4a08	

**Narrative**

[05/28/2017 19:20:25 : pos2 : chano]  
[Cleared with unit 4A08]

[05/28/2017 19:19:37 : MOB : 4A08]

Spoke with informant who stated daughters ex boyfriend boarded a flight from boston to his home. informant believes his daughter is going to be taken from his home and taken back to boston. spoke with daughter sage who stated there is no validity to the statements made by her father. Sage feels safe and there will be no harm done to her family. sage agreed to travel to Sacramento to visit family. no crime committed. 10-98

[05/28/2017 19:13:52 : pos2 : chano]  
Unit : 4A08  
C4

[05/28/2017 19:05:17 : pos2 : chano]  
Unit : 4A08  
10-6

[05/28/2017 18:48:26 : pos2 : chano]  
Unit : 4A08  
HAVE CONTACT

[05/28/2017 18:30:36 : pos10 : ROSECL]  
Cross streets: SHAKESPEARE DR//CHESNEY DR  
NBH: 796H3 90720 33.7986273663148,-118.081774826051  
INF VS 19 YO DTR IN A 415V INF IS UPSET THAT DTRS FRIENDS FROM BOSTON ARE POSS ENRTE TO THE HOUSE FROM BOSTON PER INF THEY POSS BOARDED A PLANE 8 HRS AGO

**Location Comment**

NBH: 796H3 90720 33.7986273663148,-118.081774826051

**Call Dispositions**

Date - Time	Disposition	Unit
05/28/2017 19:19:48	Assist	4A08
05/28/2017 19:20:25	No Report Needed	4A08

# EXHIBIT B



12/17/2020

Orange County Sheriff Department

11:21:18AM

## Call Detail Information Report

Call Number: 170722-0273

Call Number 170722-0273

## Call Detail Information

<b>Call Number</b>	<b>Class</b>	<b>Taker</b>	<b>Pos</b>	<b>Call Owner</b>	<b>Date - Time Received</b>	<b>Cal</b>
170722-0273	C	CEValdivia	12		07/22/2017 11:21:32	0
<b>Complaint</b>			<b>Ten Code</b>	<b>Priority</b>	<b>Disp Zone</b>	<b>IRA</b>
422R CRIMINAL THREATS REPORT				3	NO	RO01
<b>Incident Location</b>			<b>Apt/Suite</b>	<b>Floor/Bldg</b>	<b>Incident City</b>	<b>Grid</b>
11340 WEMBLEY RD					RO	796H3
<b>Caller Name</b>		<b>Patrol Zone</b>	<b>Telephone</b>	<b>Tower ID</b>	<b>Jurisdiction</b>	<b>Tract</b>
HUMPHRIES, SAGE		06	714-287-2693	-	OCSD	RO
<input type="checkbox"/> Images		<input type="checkbox"/> Medical	<input type="checkbox"/> Hazard	<input checked="" type="checkbox"/> Previous		<input type="checkbox"/> DR Issued in Error
<b>ALI Time</b>	<b>Call Rec'd</b>	<b>Xmit</b>	<b>Dispatch</b>	<b>Enroute</b>	<b>OnScene</b>	<b>Unit</b>
	11:21:32	11:22:59	11:23:59	11:23:59	12:27:09	14:57:52

## Narrative

[07/22/2017 14:57:52 : pos1 : HixsonC]  
[Cleared with unit 1A06]

[07/22/2017 14:57:00 : MOB : 1a06]  
OTHER DEPUTIES HAVE BEEN DISPATCHED TO THE HOUSE REFERENCE SIMILAR CALLS AND THE CALLS WERE UNFOUNDED.

[07/22/2017 14:54:54 : MOB : 1a06]  
INF STATES HER DAD ALLOWS HER TO USE THE PHONE BY PERMISSION ONLY, AND HAS SAVED ALL COMMUNICATIONS ON THE PHONE. INF IS WILLINGLY COMMUNICATING WITH THEM ON HER BROTHERS PHONE WHEN SHE DOES NOT HAVE HER DADS PHONE.

[07/22/2017 14:52:19 : MOB : 1a06]  
WHEN SHE RETURNS TO BOSTON. SHE HAS BEEN IN CONSTANT COMMUNICATION WITH THE COUPLE WHILE HERE IN ROSSMOOR. SHE ALLOWED ME TO VIEW HER TEXT MESSAGES WITH THEM AND THE MESSAGES WERE INCONSISTANT WITH THE STATEMENTS SHE MADE IN THE INTERVIEW. THE INF IS 19, IMPRESSIONABLE, AND WAS ABLE TO WALK AWAY OR LEAVE THE RELATIONSHIP AT ANY TIME AND CHOSE TO STAY IN IT. THE CRIMES WERE UNFOUNDED AND THE FATHER STATED THEY ARE IN THE PROCESS OF ATTEMPTING TO OBTAIN RESTRAINING ORDERS IN BOSTON.

[07/22/2017 14:48:22 : MOB : 1a06]  
FATHER STATED HE CONTACTED BOSTON PD A COUPLE OF MONTHS AGO TO RELAY THE INFORMATION AND THEY ADVISED HIM WHEN THEIR DAUGHTER IS READY TO SPEAK WITH THEM, THEY WILL LOOK INTO IT. INF IS RETURNING TO BOSTON IN A COUPLE OF WEEKS FOR WORK AND WAS PLANNING ON TELLING BOSTON PD ABOUT THE RELATIONSHIP.

[07/22/2017 14:47:11 : MOB : 1a06]  
THE 422 WAS UNFOUNDED BASED ON THE INTERVIEW. THE STATEMENTS MADE ON SNAPCHAT WERE INTERPRETED AS SEXUAL IN NATURE AND NOT IMPLIED TO MEAN GREAT BODILY INJURY OR DEATH. THE SEXUAL RELATIONS INCLUDED 'BONDAGE' TYPE ROLE PLAYING AND SHE BELIEVED THE STATEMENT WAS REFERENCE TO 'BONDAGE'

[07/22/2017 14:45:38 : MOB : 1a06]  
CONTACTED INF WHO STATED SHE IS A BALLET DANCER IN BOSTON WHO BEFRIENDED A COUPLE ( MITCHELL TAYLOR MOORE AND DUSTY RACHEL BUTTON) ASSOCIATED WITH THE DANCE COMPANY SHE WORKED FOR. SHE WILLINGLY STAYED AT THERE APARTMENT MOST OF THE TIME, CONSENTED TO ENGAGING IN AN OPEN ROMANTIC RELATIONSHIP WITH THEM, HAD CONSensual INTIMATE RELATIONS WITH THEM FOR A FEW MONTHS. 261 WAS UNFOUNDED BASED ON THE INTERVIEW.

# EXHIBIT C



+1714 [REDACTED] Mom ☐

May 17, 2017 08:07:08

They are not your masters

+1714 [REDACTED] Mom ☐

May 17, 2017 08:08:16

I don't know what control

+1714 [REDACTED] Mom ☐

May 17, 2017 08:08:32

I'm pretty sure this is a threesome

+1714 [REDACTED] Mom ☐

May 17, 2017 08:08:41

And I'm completely weirded out by all of it

+1714 [REDACTED] Mom ☐

May 17, 2017 08:10:48

You've known them 3 months

+1714 [REDACTED] Mom ☐

May 17, 2017 08:14:02

I love you sage but this situation is destructive to you

+1714 [REDACTED] Mom ☐

May 17, 2017 08:14:12

And not healthy

+15627 [REDACTED] Sage Nicole Humphries

May 17, 2017 08:15:18

1) dusty is texting you regarding what you said about her to dr k

+1562 [REDACTED] Sage Nicole Humphries

May 17, 2017 08:15:37

2) you are paranoid and sound crazy regarding this relationship

+1714 [REDACTED] Mom ☐

May 17, 2017 08:15:44

It is weird sage

+1562 [REDACTED] Sage Nicole Humphries

May 17, 2017 08:15:47

3) this is my choice

+1714 [REDACTED] Mom ☐

May 17, 2017 08:15:55

Sage

+1562 [REDACTED] Sage Nicole Humphries

May 17, 2017 08:15:58

4) my life my summer

+1714 [REDACTED] Mom ☐

May 17, 2017 08:16:02

I love you with all my heart

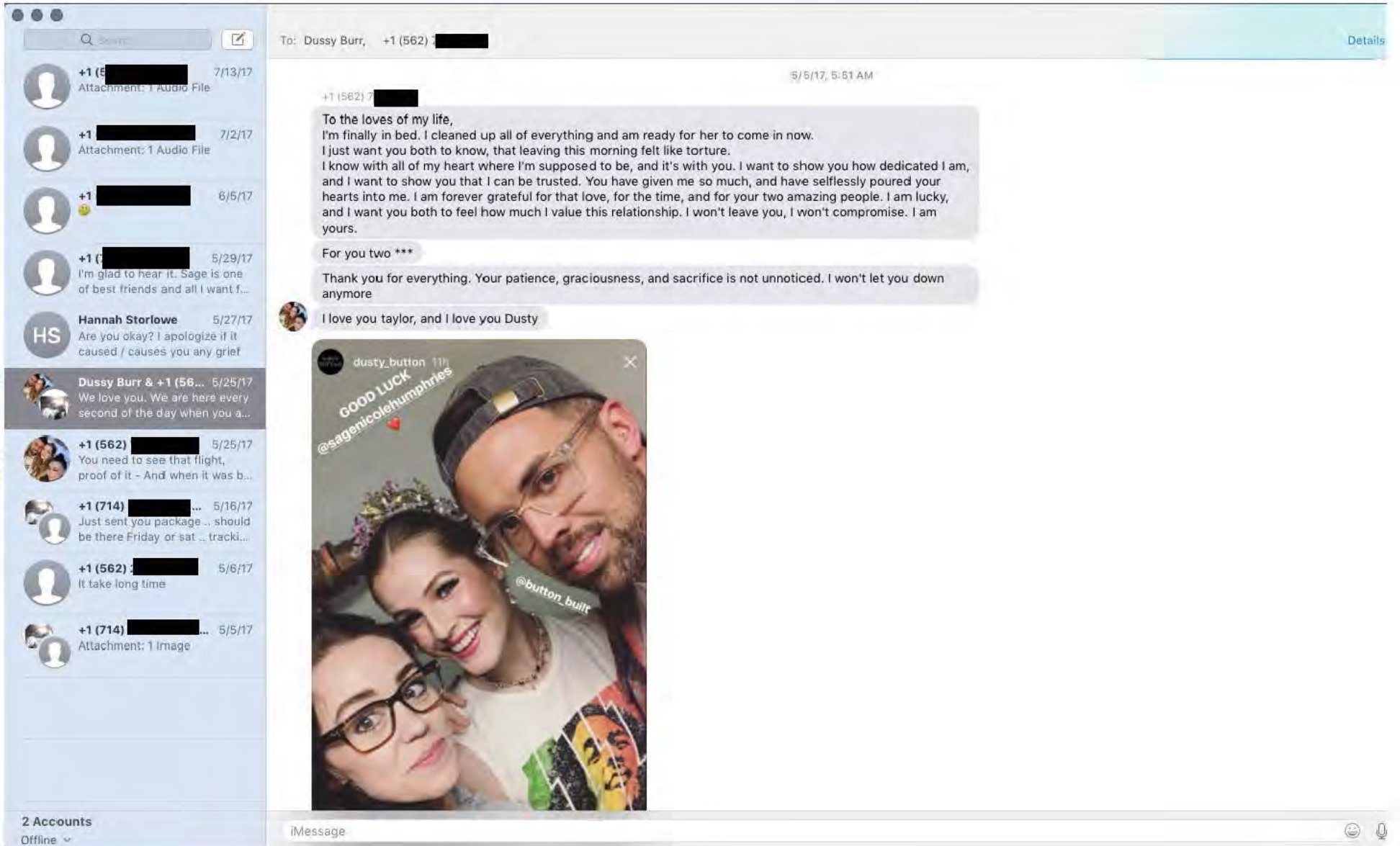
+1562 [REDACTED] Sage Nicole Humphries

May 17, 2017 08:16:28

Nobody is controlling my life, you are the only person trying to do so

# EXHIBIT D

Ex. pg. 008





To: +1 (562) [REDACTED] Details

+1 (562) [REDACTED] 7/13/17  
Attachment: 1 Audio File

+1 (714) [REDACTED] 7/2/17  
Attachment: 1 Audio File

+1 [REDACTED] 6/5/17

+1 (760) [REDACTED] 5/29/17  
I'm glad to hear it. Sage is one of best friends and all I want f...

Hannah Storlowe 5/27/17  
Are you okay? I apologize if it caused / causes you any grief

Dussy Burr & +1 (562) [REDACTED] 5/25/17  
We love you. We are here every second of the day when you a...

+1 (562) [REDACTED] 5/25/17  
You need to see that flight, proof of it - And when it was b...

+1 (714) [REDACTED] ... 5/16/17  
Just sent you package .. should be there Friday or sat .. tracki...

+1 (562) [REDACTED] 5/6/17  
It take long time

+1 (714) [REDACTED] ... 5/5/17  
Attachment: 1 Image

I have been since the beginning too Tay.. I'm sorry I haven't given you what you deserve. I'm so far in love with you I could never go back

I know what you need

I am capable of giving you everything you need

And want to be that person forever

I love you

I'm yours baby

All yours

I am so in love with you Taylor

Thank you for showing me grace and mercy and what love really means

I will do this for you

I know and I believe you

Everything is feeling super equal now.. so it makes me ask... do you feel weird touching or kissing me when she's not there?

?

I understand that clearly now and don't want it with anyone but you. I need it too and am running on empty

This is exactly what I need

This that you are doing

Im yours

Thats why I am so in love with you, thank you for this


You have all of me still I promise

Always will

Not at all I need that, I need that privacy - I am just not down with you having it with anyone else

Coming right up then

5/18/17, 4:37 PM



2 Accounts Offline ▾ iMessage

Ex. pg. 010

+1 (562) [REDACTED]

7/13/17

Attachment: 1 Audio File

+1 (714) [REDACTED]

7/2/17

Attachment: 1 Audio File

+1 (909) [REDACTED]

6/5/17

👍

+1 (760) [REDACTED]

5/29/17

I'm glad to hear it. Sage is one of best friends and all I want f...

HS

Hannah Storlowe

5/27/17

Are you okay? I apologize if it caused / causes you any grief

Dussy Burr & +1 (562) [REDACTED]

5/25/17

We love you. We are here every second of the day when you a...

+1 (562) [REDACTED]

5/25/17

You need to see that flight, proof of it - And when it was b...

+1 (714) [REDACTED]

5/16/17

Just sent you package .. should be there Friday or sat .. track)...

+1 (562) [REDACTED]

5/6/17

It take long time

+1 (714) 2 [REDACTED]

5/5/17

Attachment: 1 Image

2 Accounts

Offline

To: +1 (562) [REDACTED]

Details

It's okay I love you

I won't... but I can't be ok because I want your heart to be ok

I love you more than anything/ anyone

I want you to remember the girl who ran down to the basement to be with you

I will be yours

That is who I am

You are who I love

Every time I touch you under the table

Ever glance

\*every

Don't forget last night

And don't forget sitting with me at my house

And all the times we have been together

You have made me fall deeper in love with you than anyone ever can do in my life

This is all I think about and am consumed with

Love me

I will love you forever

Please touch me again

Look me in the eyes

Because I need your soul

I want us to be more in love

And grow through this together

I will never forget her

I know she is you and you are her

Be mine

I love you

I will be all of that and give you all of that

Will never forget either

iMessage

🌝 🗣



Ex. pg. 011

Search [ ] [ ]

To: +1 (562) [REDACTED] Details

+1 (562) [REDACTED] 7/13/17  
Attachment: 1 Audio File

+1 (714) [REDACTED] 7/2/17  
Attachment: 1 Audio File

+1 (909) [REDACTED] 6/5/17

+1 (760) [REDACTED] 5/29/17  
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Hannah Storlowe 5/27/17  
Are you okay? I apologize if it caused / causes you any grief

Dussy Burr & +1 (562) [REDACTED] 5/25/17  
We love you. We are here every second of the day when you a...

+1 (562) [REDACTED] 5/25/17  
You need to see that flight, proof of it - And when it was b...

+1 (714) [REDACTED] 5/18/17  
Just sent you package .. should be there Friday or sat .. tracki...

+1 (562) [REDACTED] 5/6/17  
It take long time

+1 (714) [REDACTED] 5/5/17  
Attachment: 1 Image

2 Accounts  
Offline ~

This is it.. like really... for me I know in my heart  
You are mine  
I can't lose the other half of me

You literally complete my heart

I want that  
Thank you  
I need you like that  
I can't go backwards  
I'm so sorry for the pain I've caused you

I won't... but I can't be ok because I want your heart to be ok  
I love you more than anything/ anyone  
I want you to remember the girl who ran down to the basement to be with you

I will be yours  
That is who I am  
You are who I love  
Every time I touch you under the table  
Ever glance  
\*every

You never will

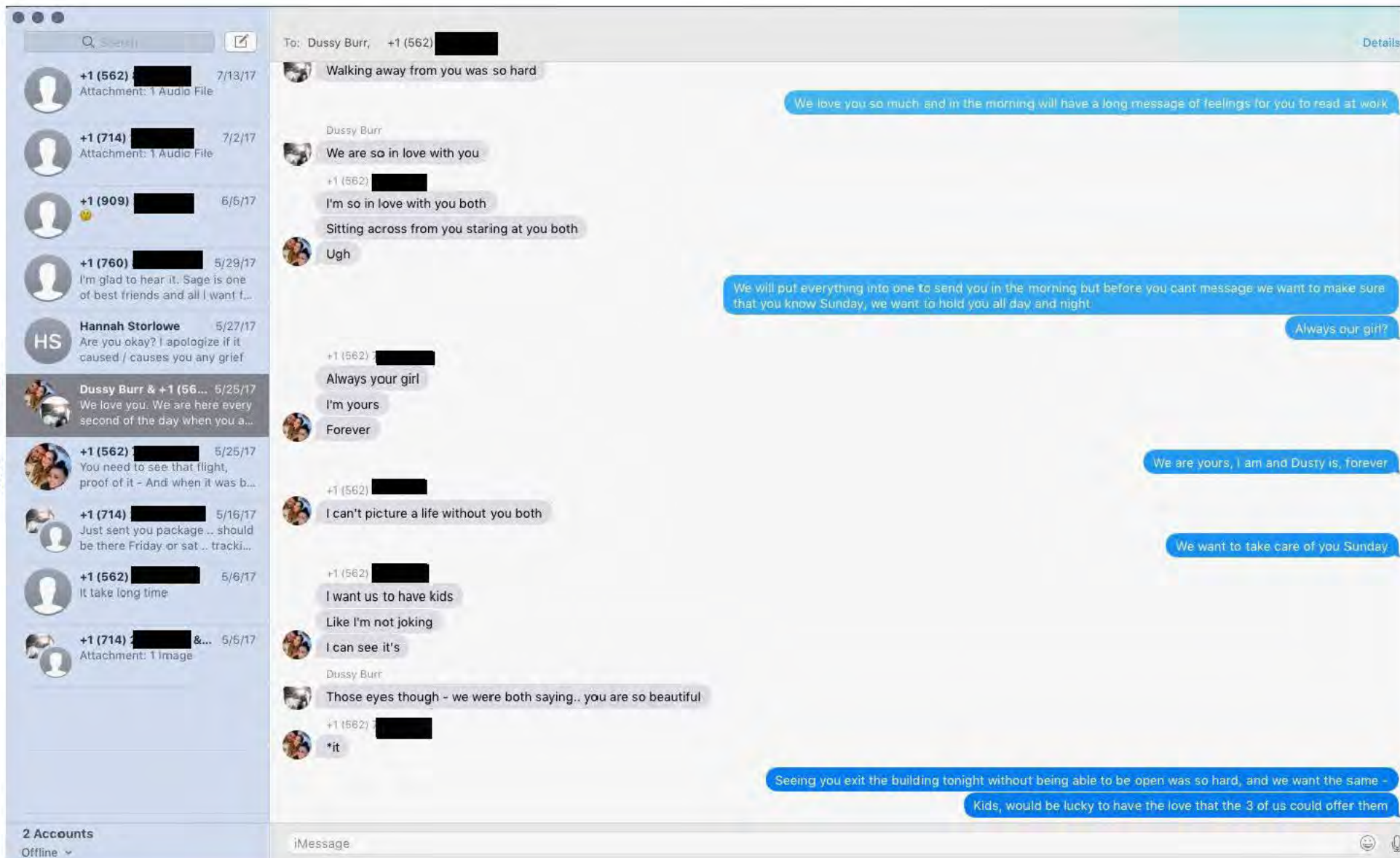
Im yours  
YOURS ALONE

Dont then  
Its okay I love you

I will never forget her  
I know she is you and you are her  
Be mine  
I love you

iMessage

Ex. pg. 012



+1 (562) [REDACTED]

7/13/17

Attachment: 1 Audio File

+1 (714) [REDACTED]

7/2/17

Attachment: 1 Audio File

+1 (909) [REDACTED]

6/5/17

+1 (760) [REDACTED]

5/29/17

I'm glad to hear Sage is one of best friends and all I want f...

HS

Hannah Storlowe

5/27/17

Are you okay? I apologize if it caused / causes you any grief

[Group Photo]

Dussy Burr & +1 (562) [REDACTED]

5/25/17

We love you. We are here every second of the day when you a...

[Group Photo]

+1 (562) [REDACTED]

5/25/17

You need to see that flight, proof of it - And when it was b...

+1 (714) [REDACTED] ...

5/16/17

Just sent you package .. should be there Friday or sat... tracki...

+1 (562) [REDACTED]

5/6/17

It take long time

+1 (714) [REDACTED] &...

5/5/17

Attachment: 1 Image

To: Dussy Burr, +1 (562) [REDACTED]

Details

Dussy Burr

Oh boy that's fun lol

She loves you

It is actually upsetting to feel like I have to convince someone - and do so on a weekend where I felt shut out

I'm sorry baby

Sorry one sec I'm taking dogs

+1 (562) [REDACTED]

Sorry didn't mean to call I know you're working

Okay

I didnt get a call?

Me going to your house gives you anxiety?

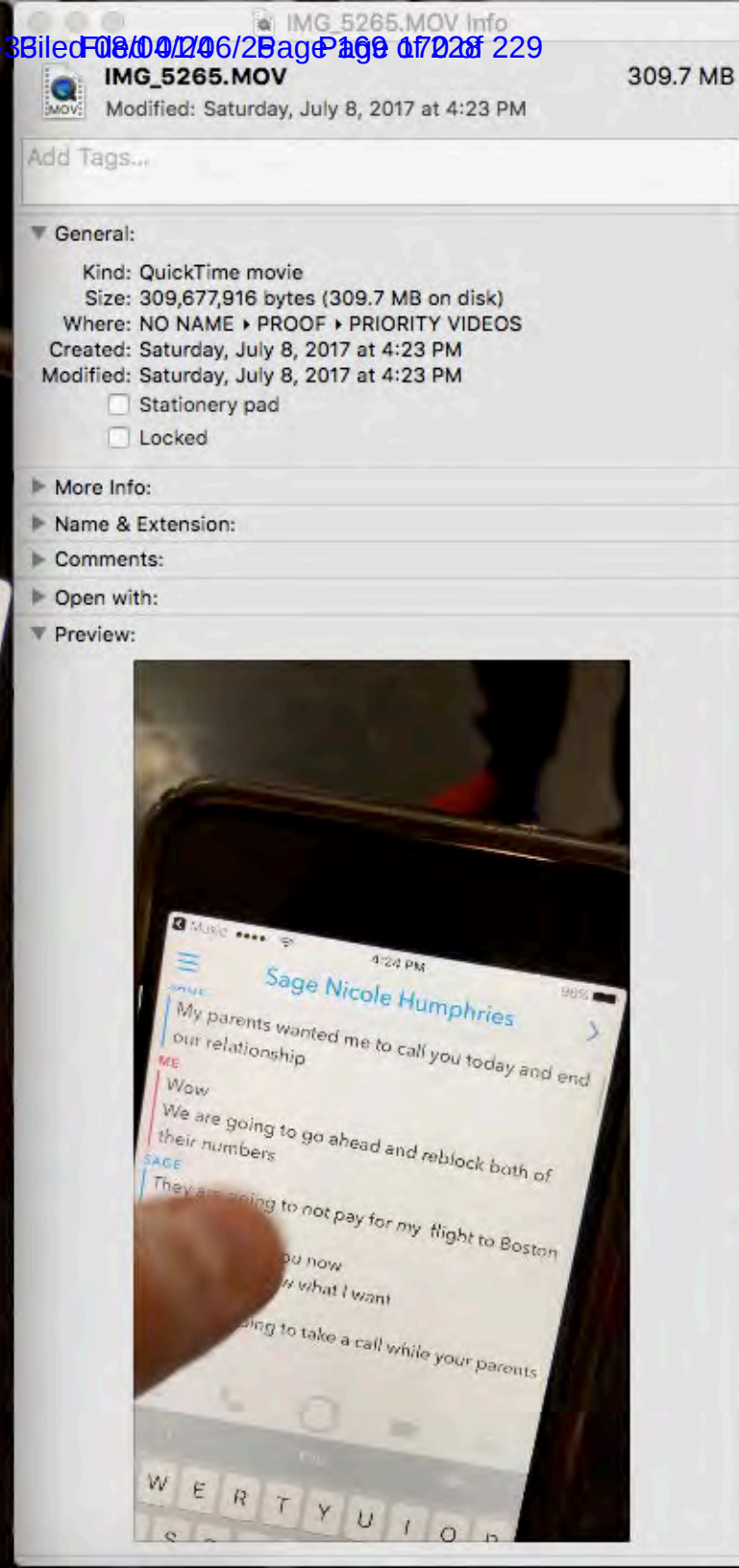
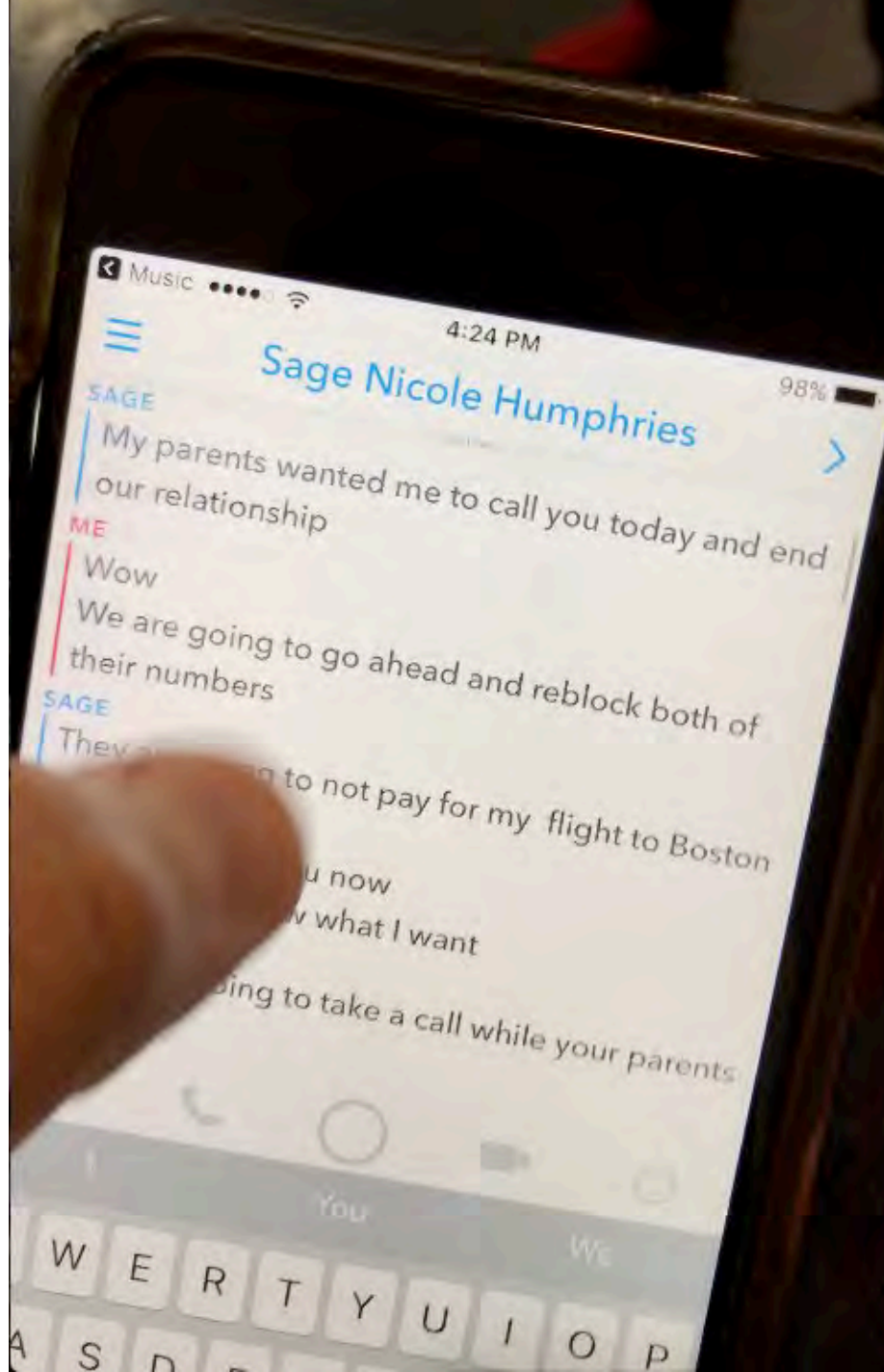
Okay well it's my job to make you guys happy, so whatever it takes

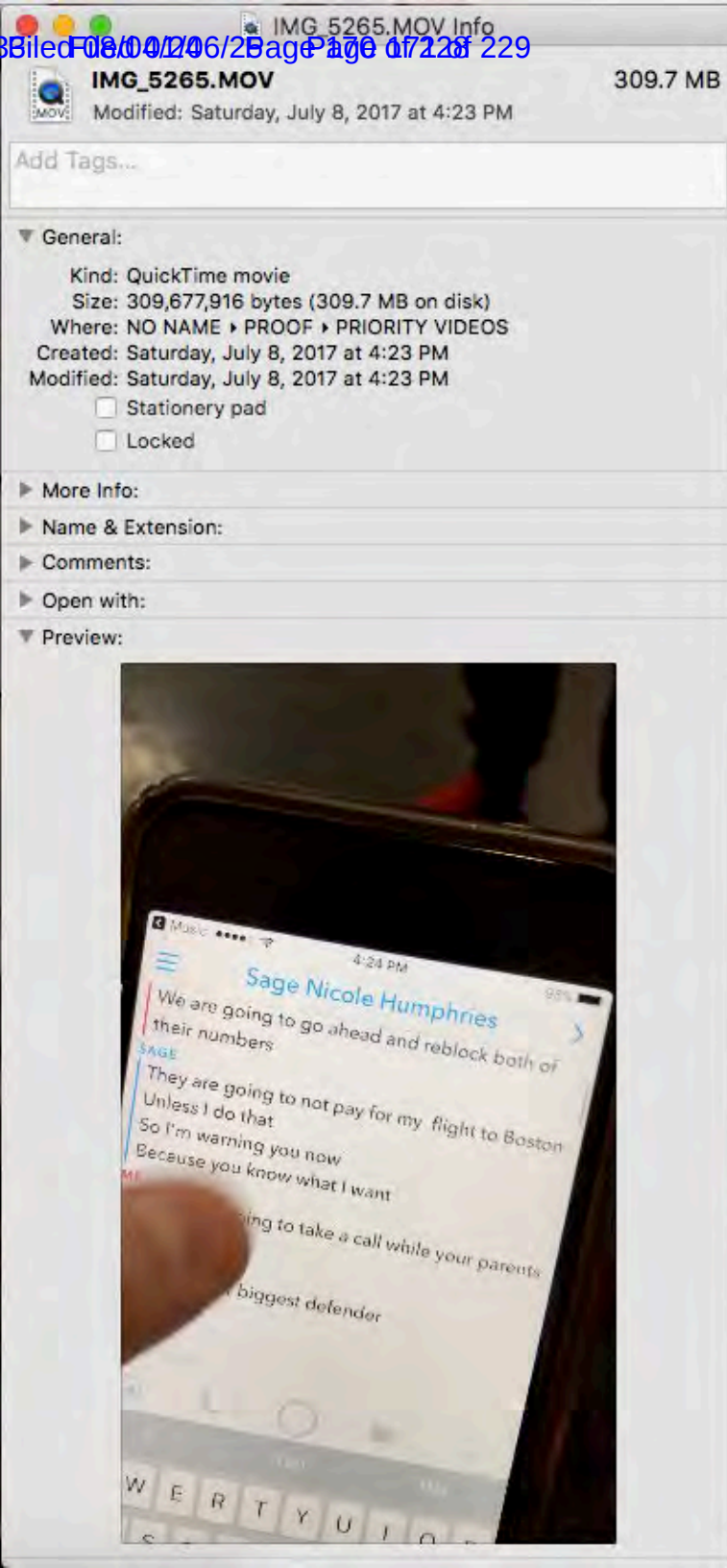
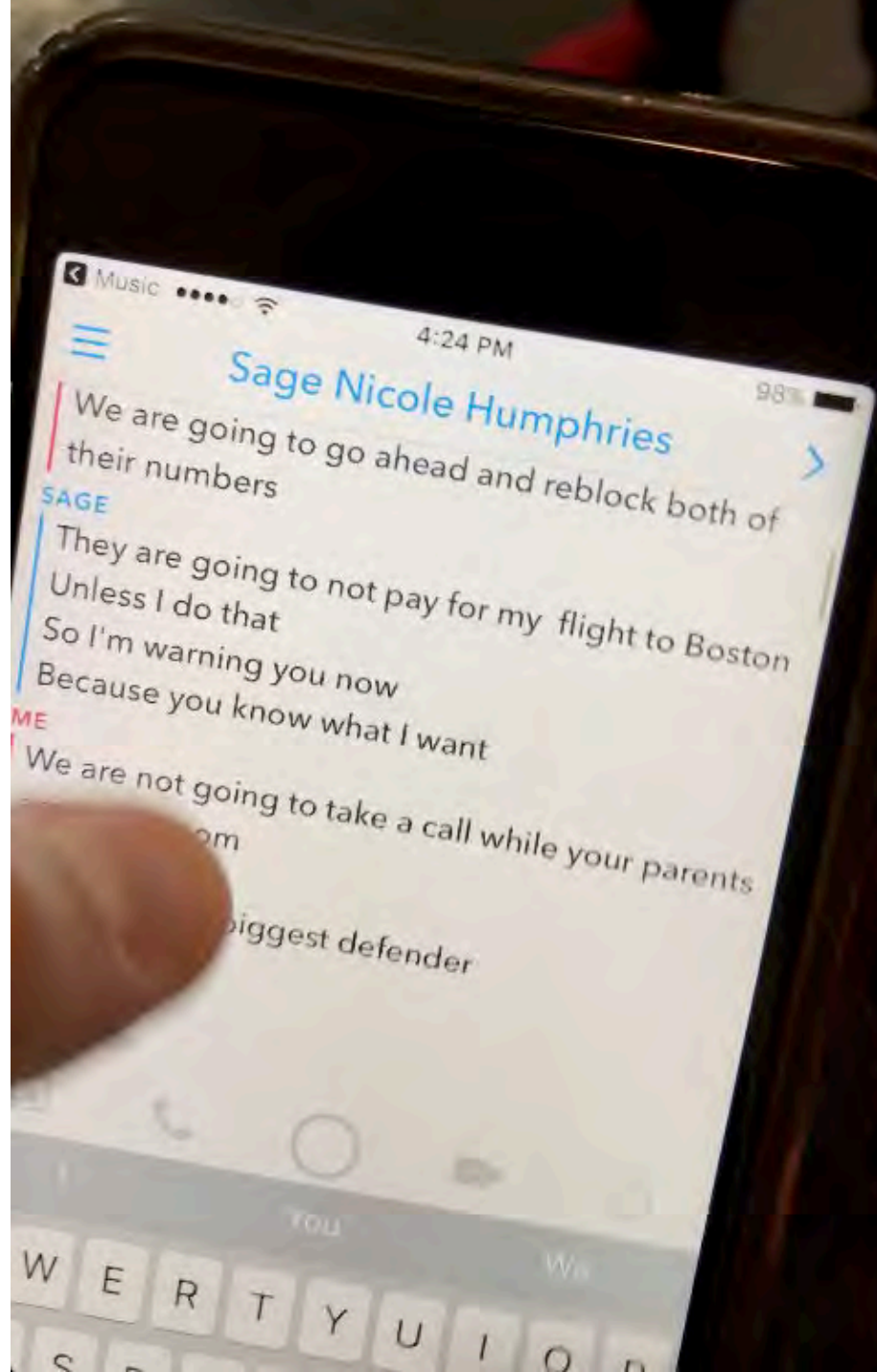
You lift stresses off of my shoulders, care more than anyone else, and make me feel so loved and happy

Message

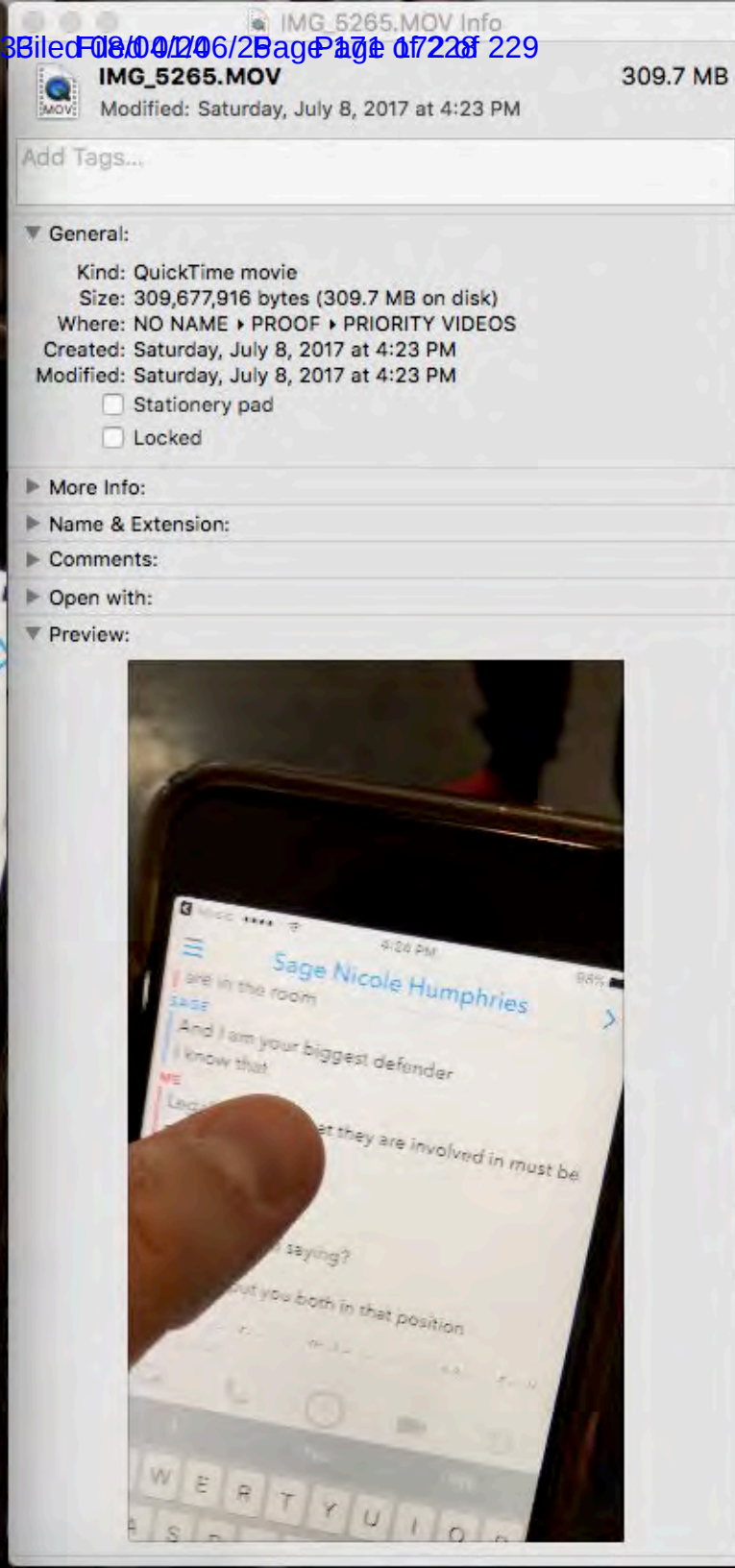
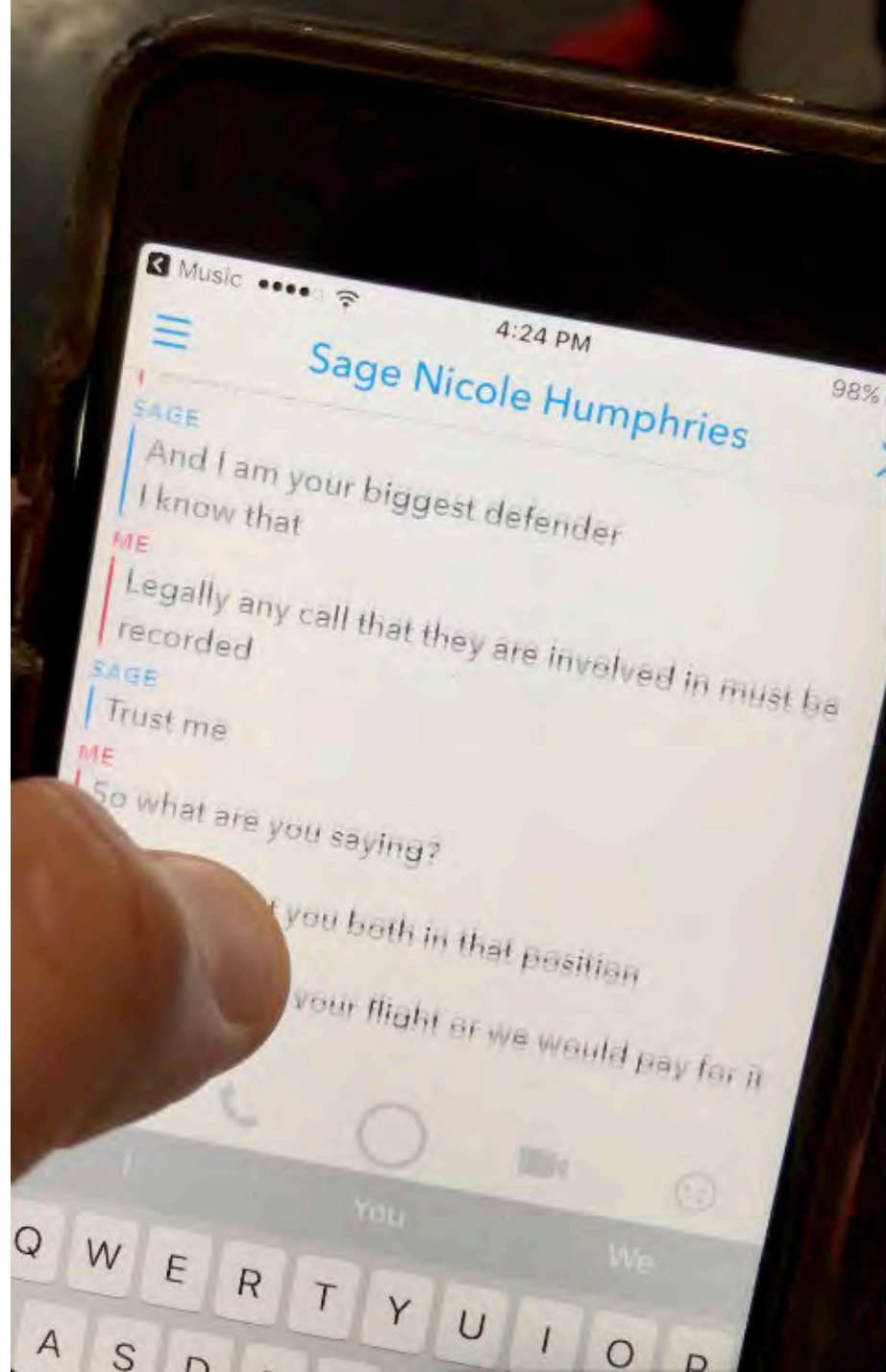
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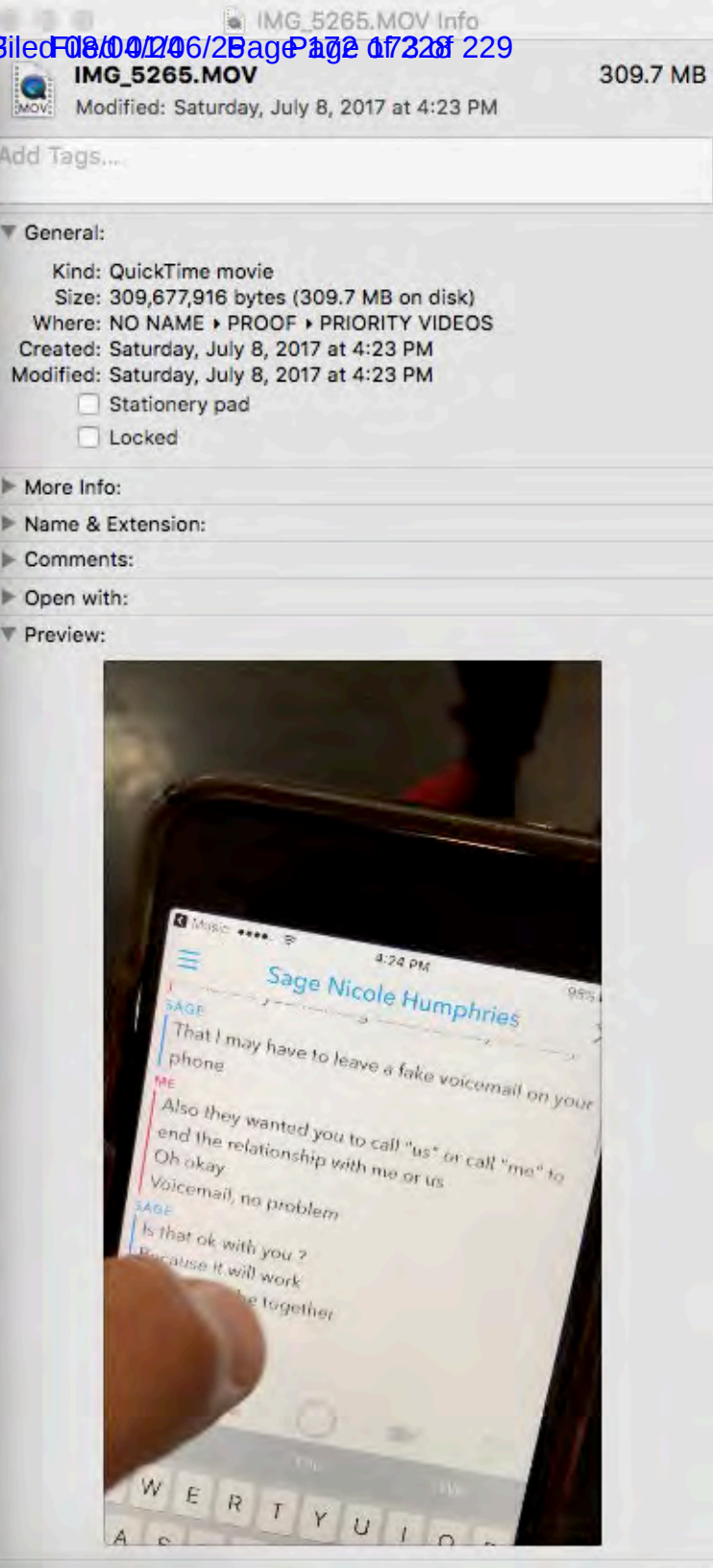
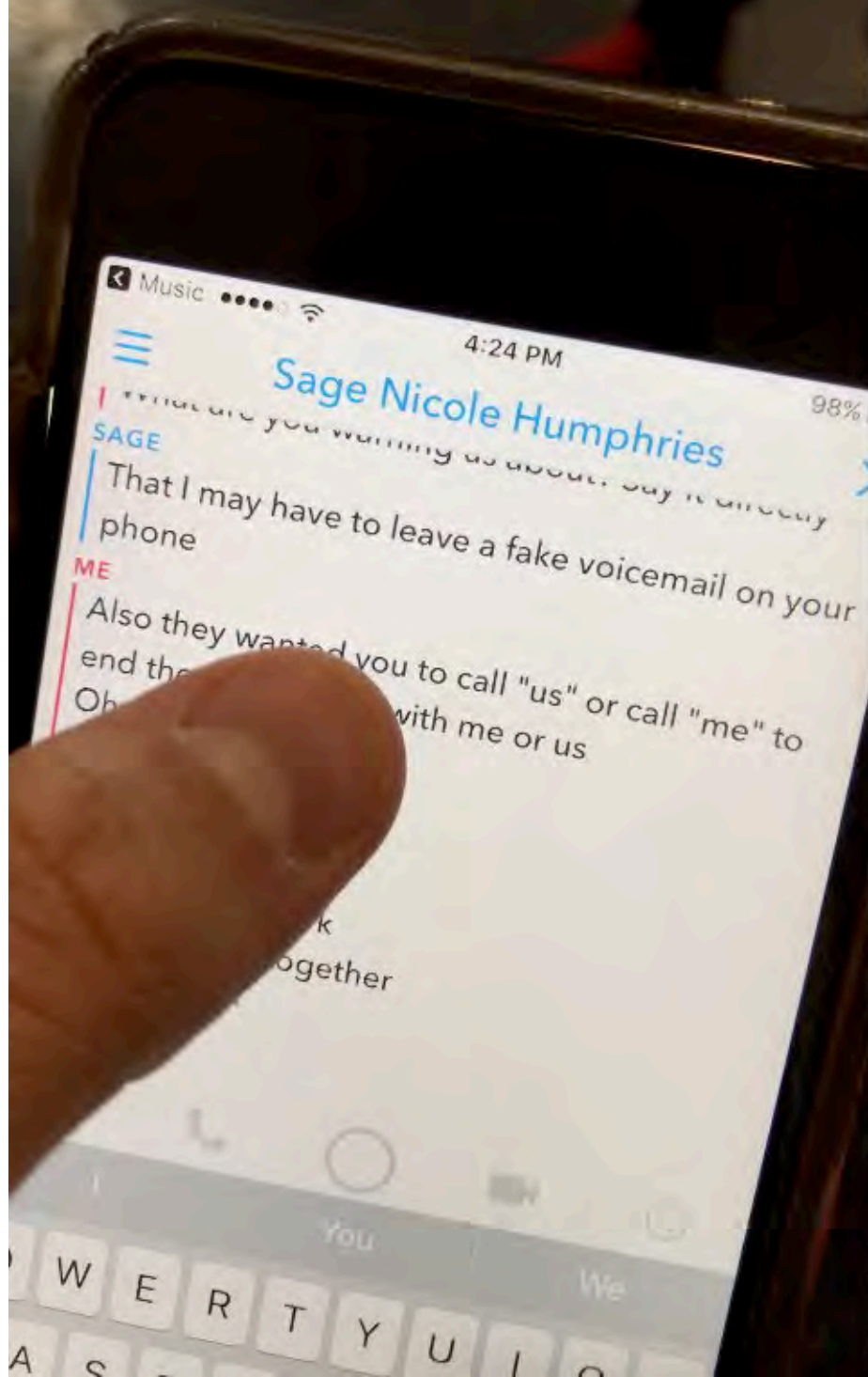














IMG\_5265.MOV

309.7 MB

Modified: Saturday, July 8, 2017 at 4:23 PM

Add Tags...

## ▼ General:

Kind: QuickTime movie

Size: 309,677,916 bytes (309.7 MB on disk)

Where: NO NAME ► PROOF ► PRIORITY VIDEOS

Created: Saturday, July 8, 2017 at 4:23 PM

Modified: Saturday, July 8, 2017 at 4:23 PM

☐ Stationery pad☐ Locked

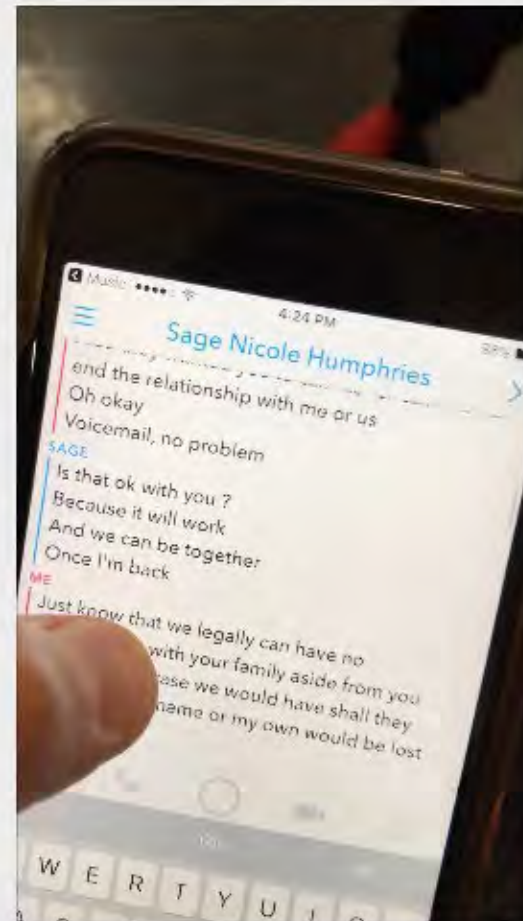
## ► More Info:

► Name &amp; Extension:

► Comments:

► Open with:

## ▼ Preview:



Music

4:24 PM

98%

Sage Nicole Humphries

end the relationship with me or us  
Oh okay  
Voicemail, no problem

SAGE

Is that ok with you ?  
Because it will work  
And we can be together  
Once I'm back

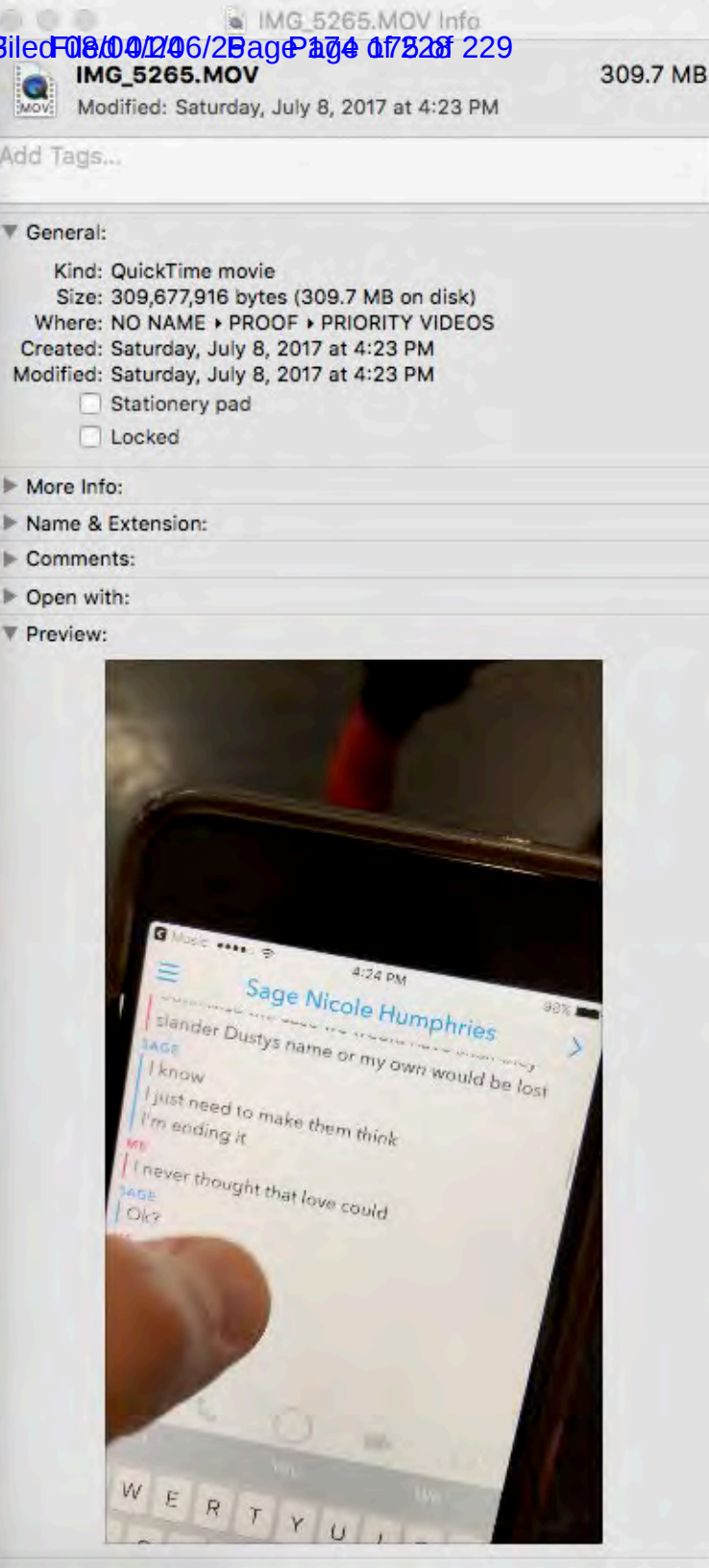
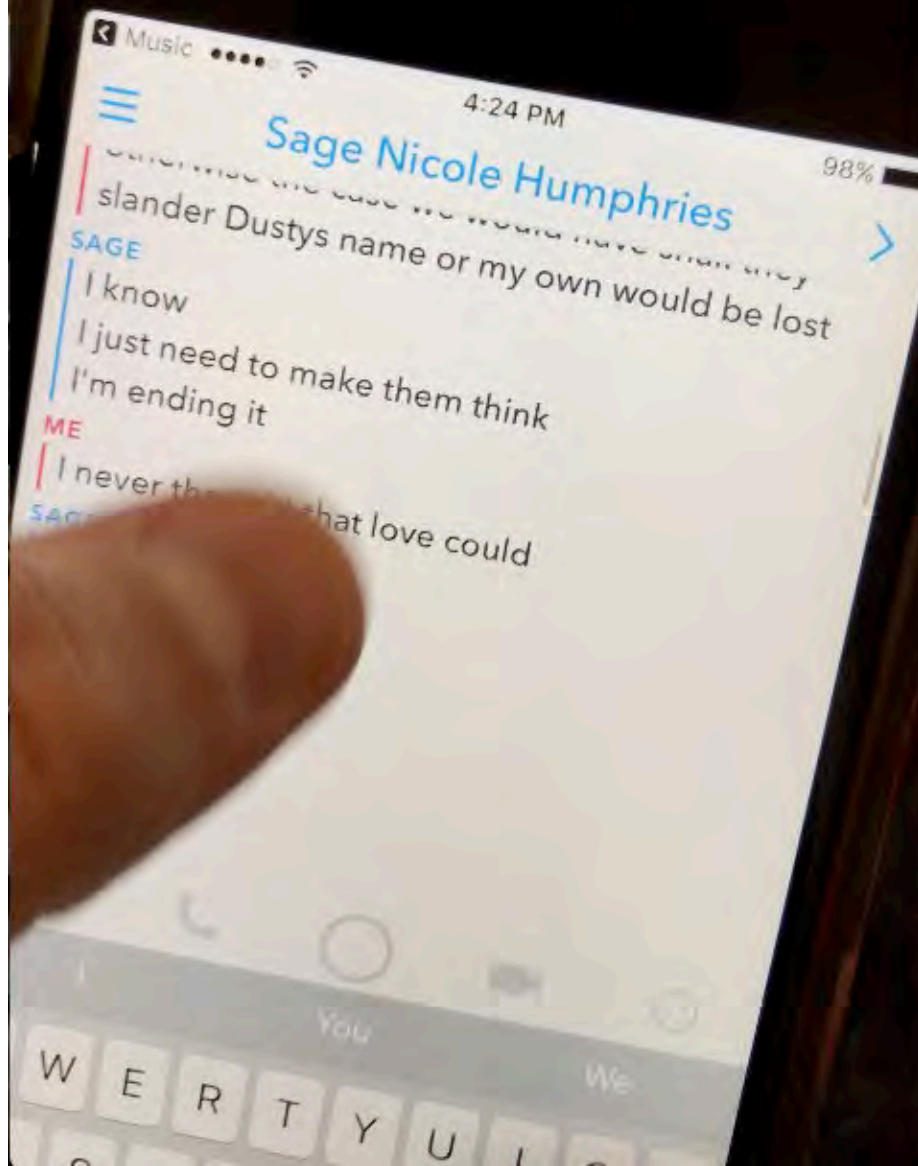
ME

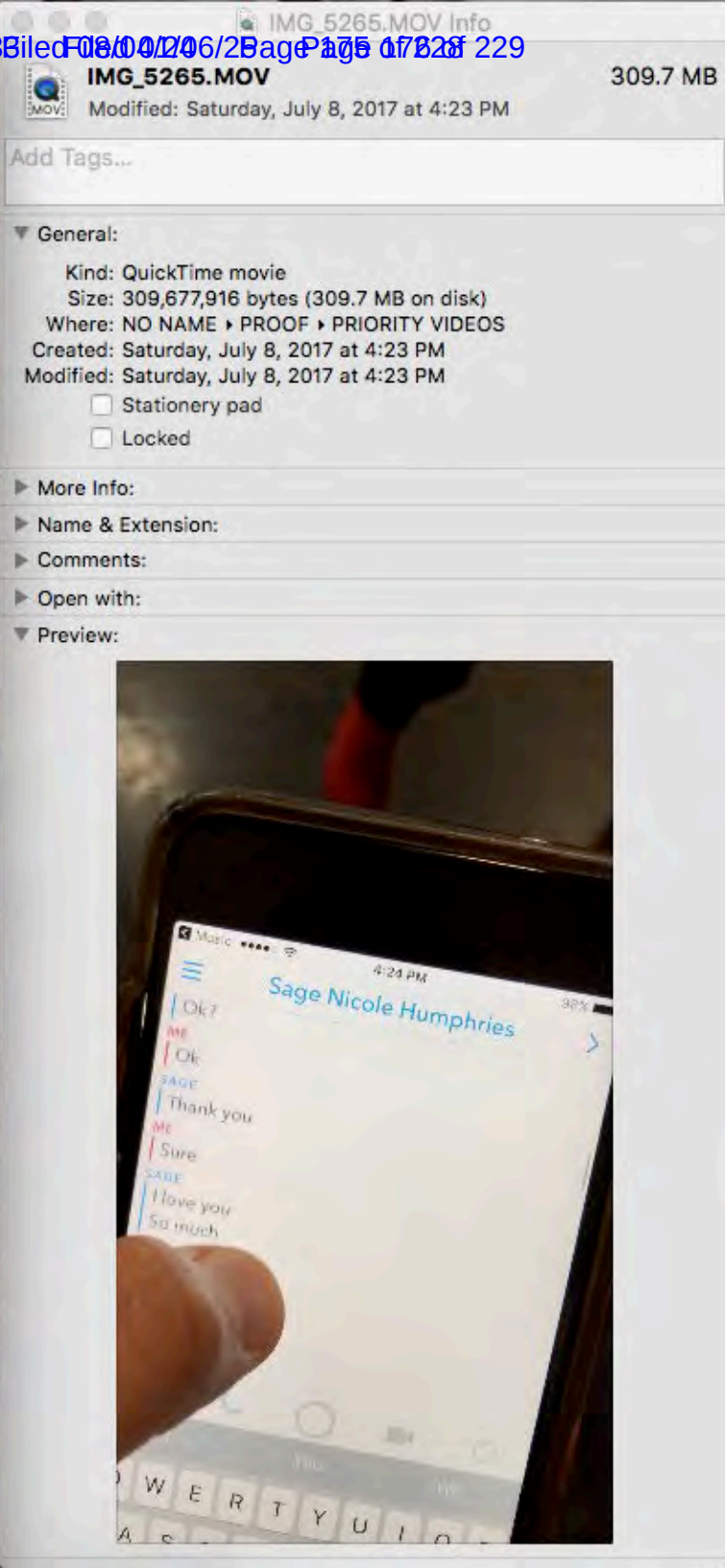
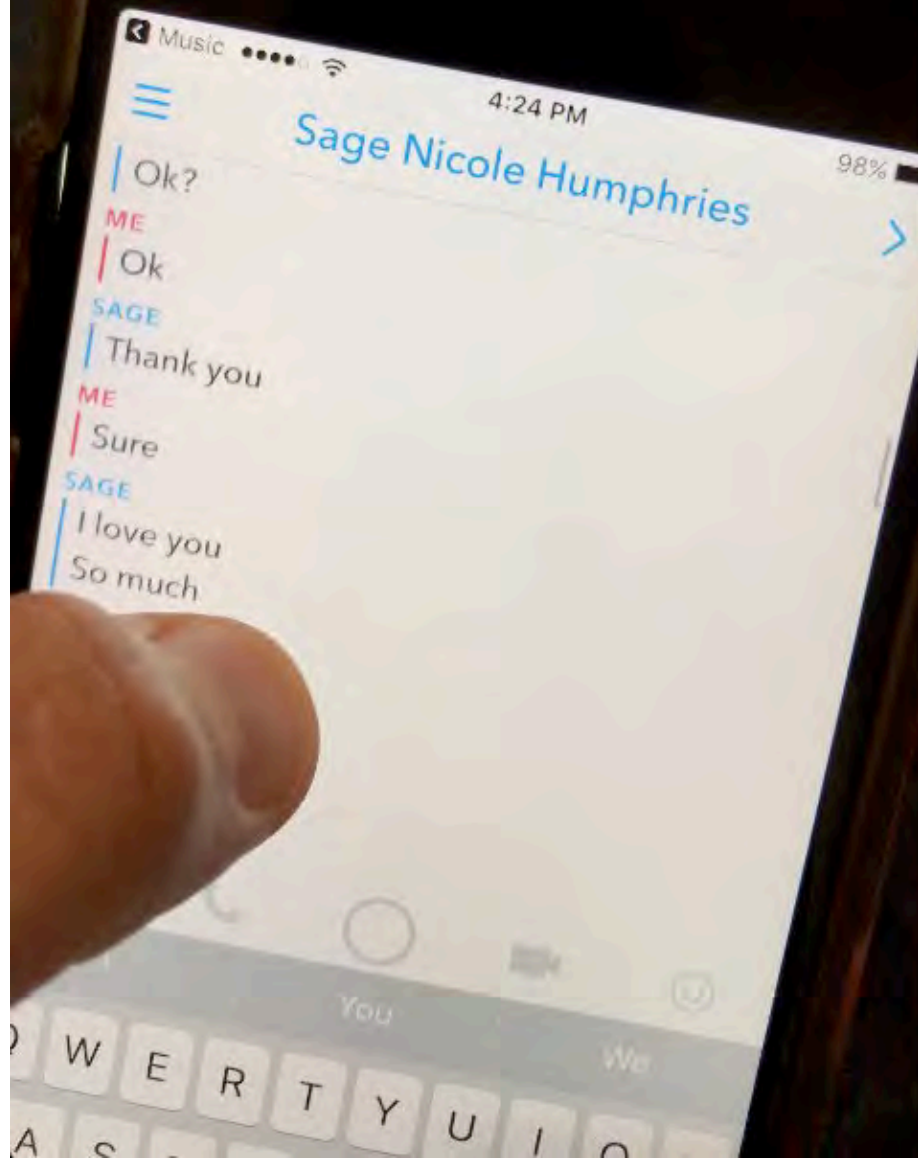
Just know that we legally can have no  
with your family aside from you  
these we would have shall they  
name or my own would be lost

You

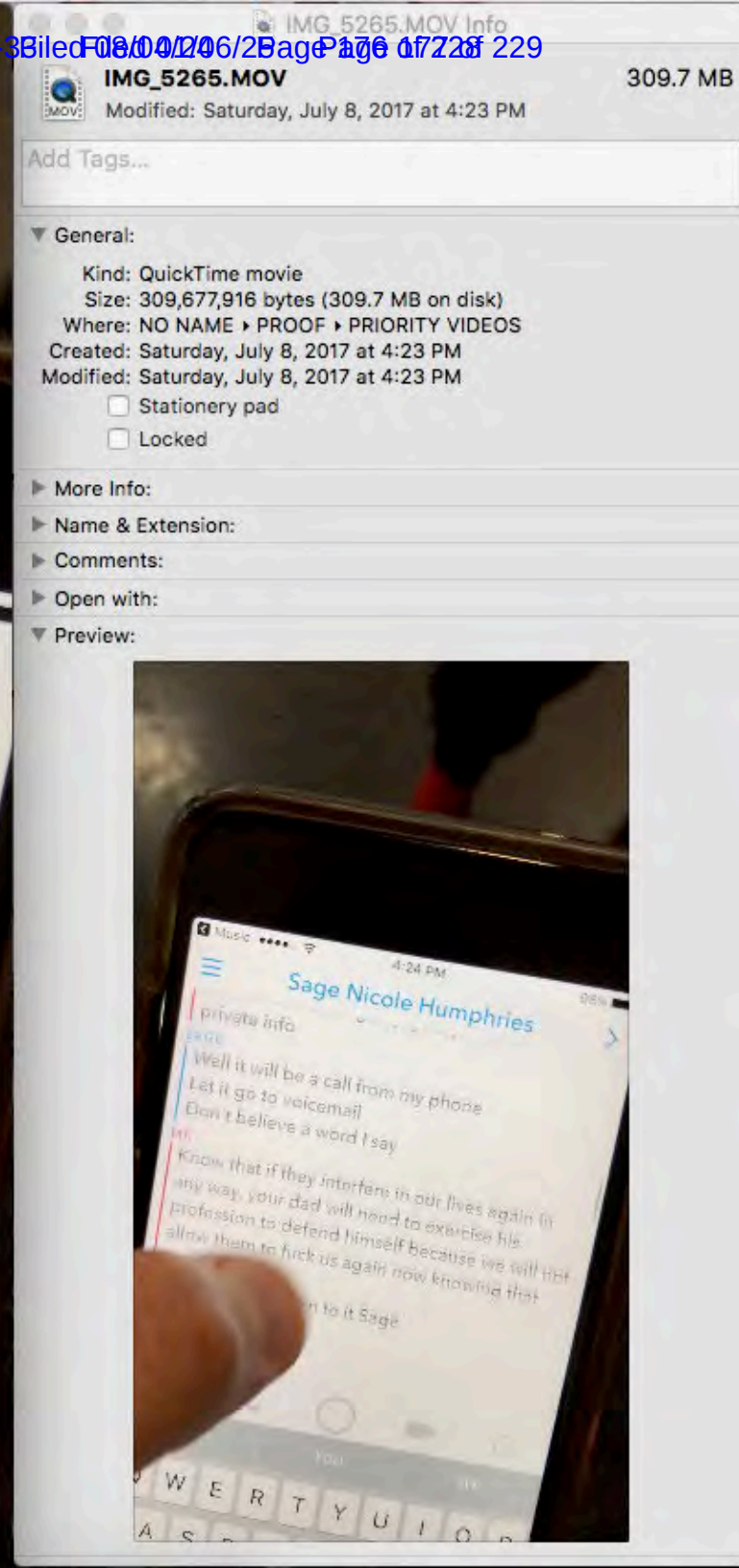
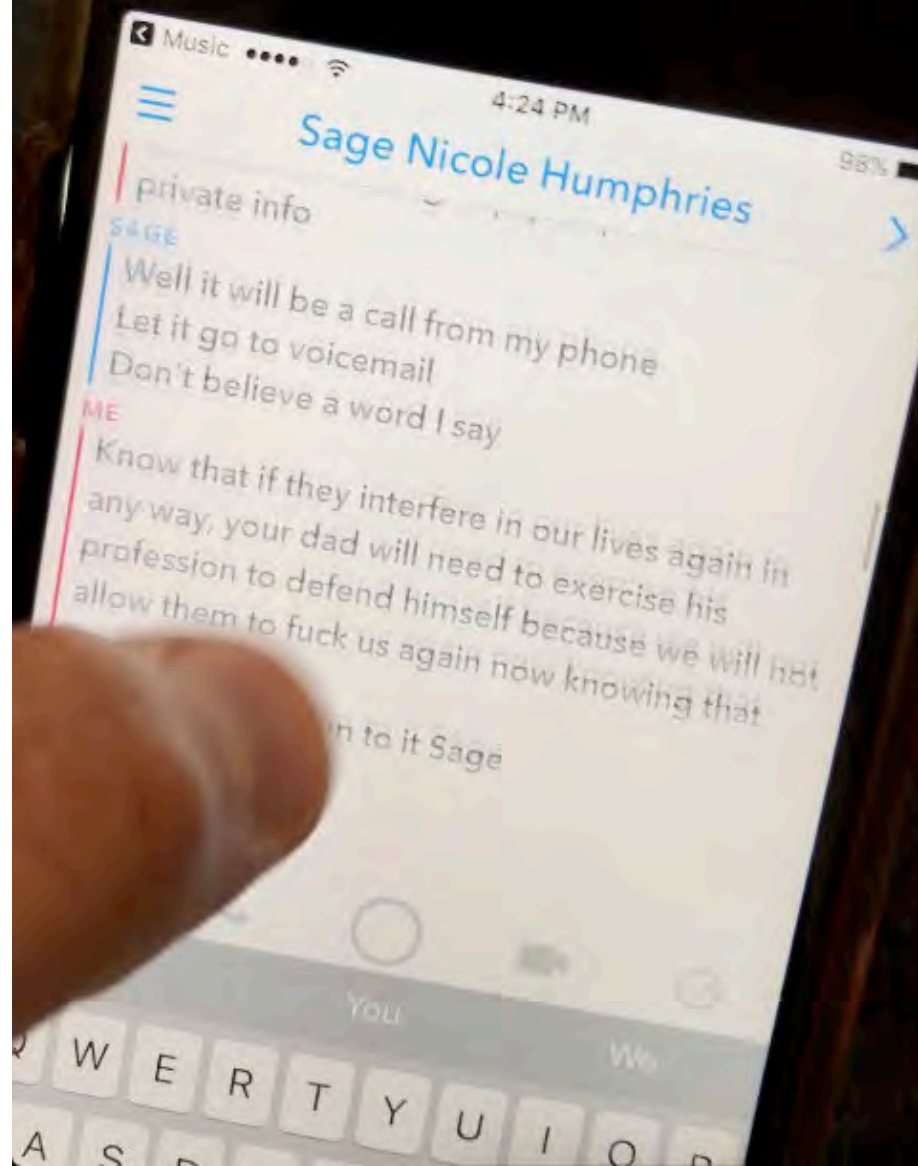
W E R T Y U I

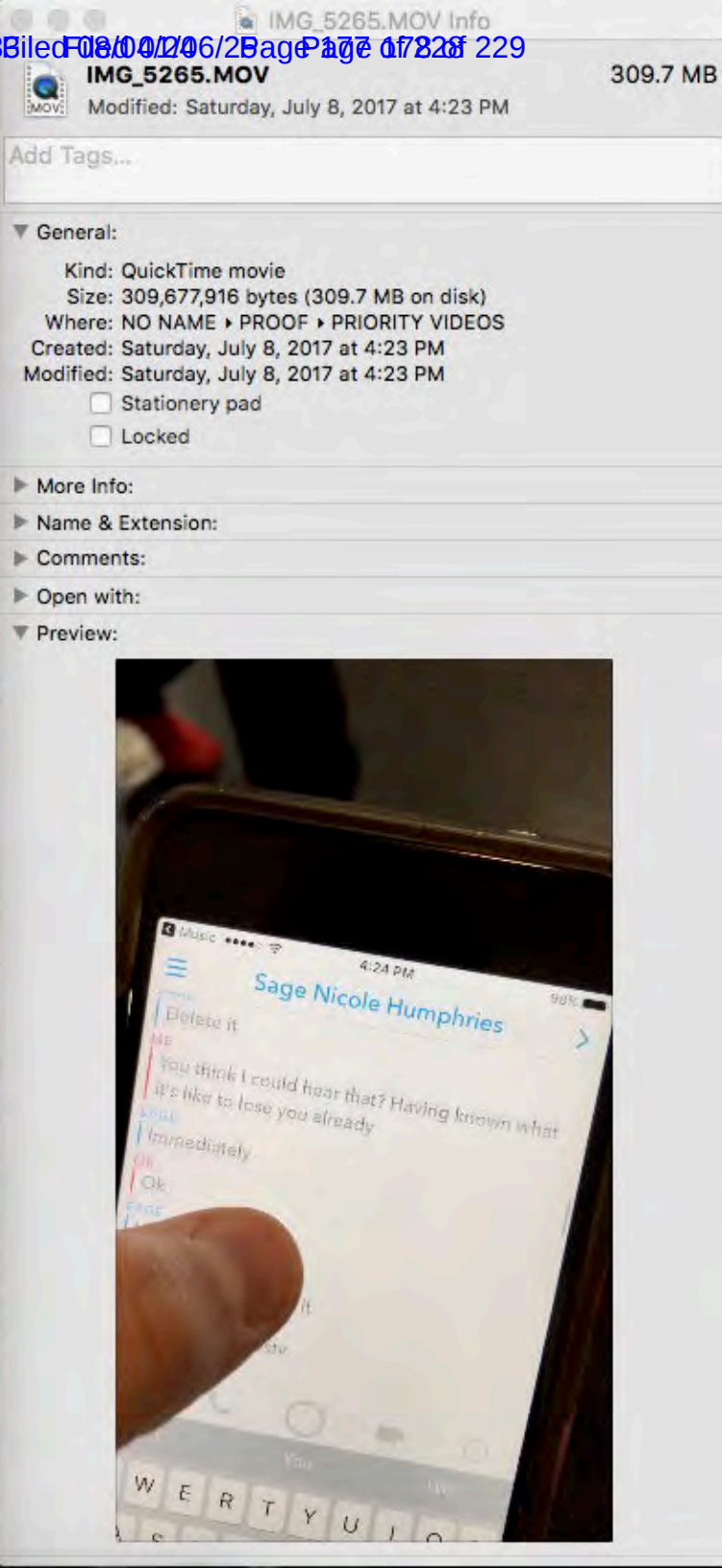
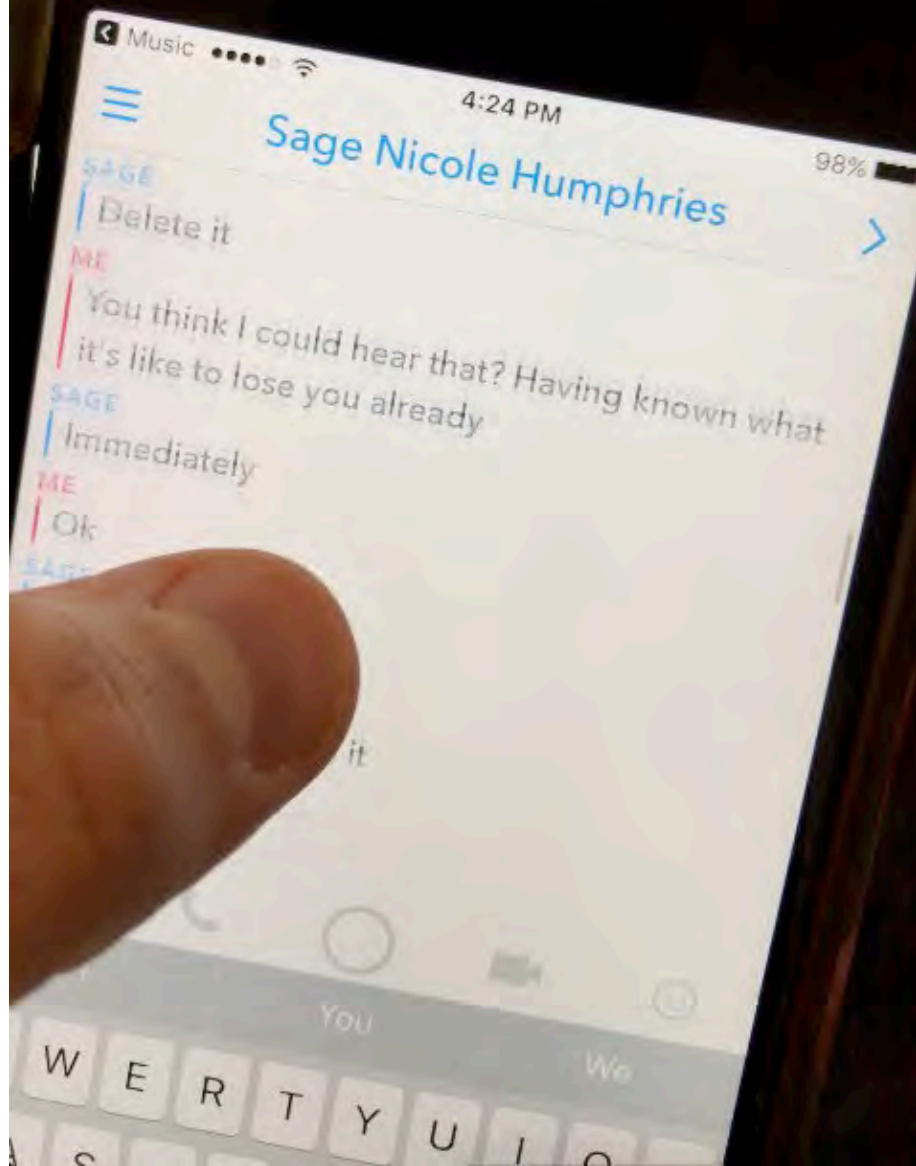
















IMG\_5265.MOV

309.7 MB

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Add Tags...

## ▼ General:

Kind: QuickTime movie

Size: 309,677,916 bytes (309.7 MB on disk)

Where: NO NAME ► PROOF ► PRIORITY VIDEOS

Created: Saturday, July 8, 2017 at 4:23 PM

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☐ Stationery pad☐ Locked

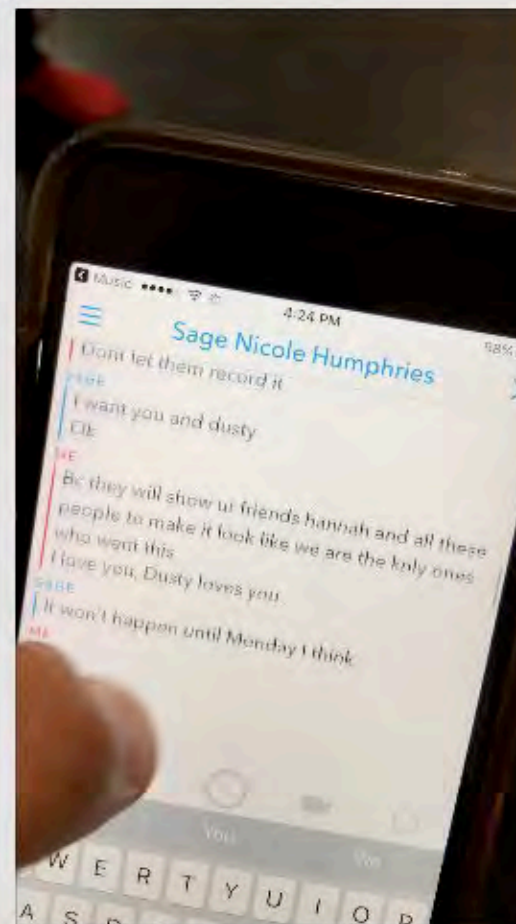
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► Name &amp; Extension:

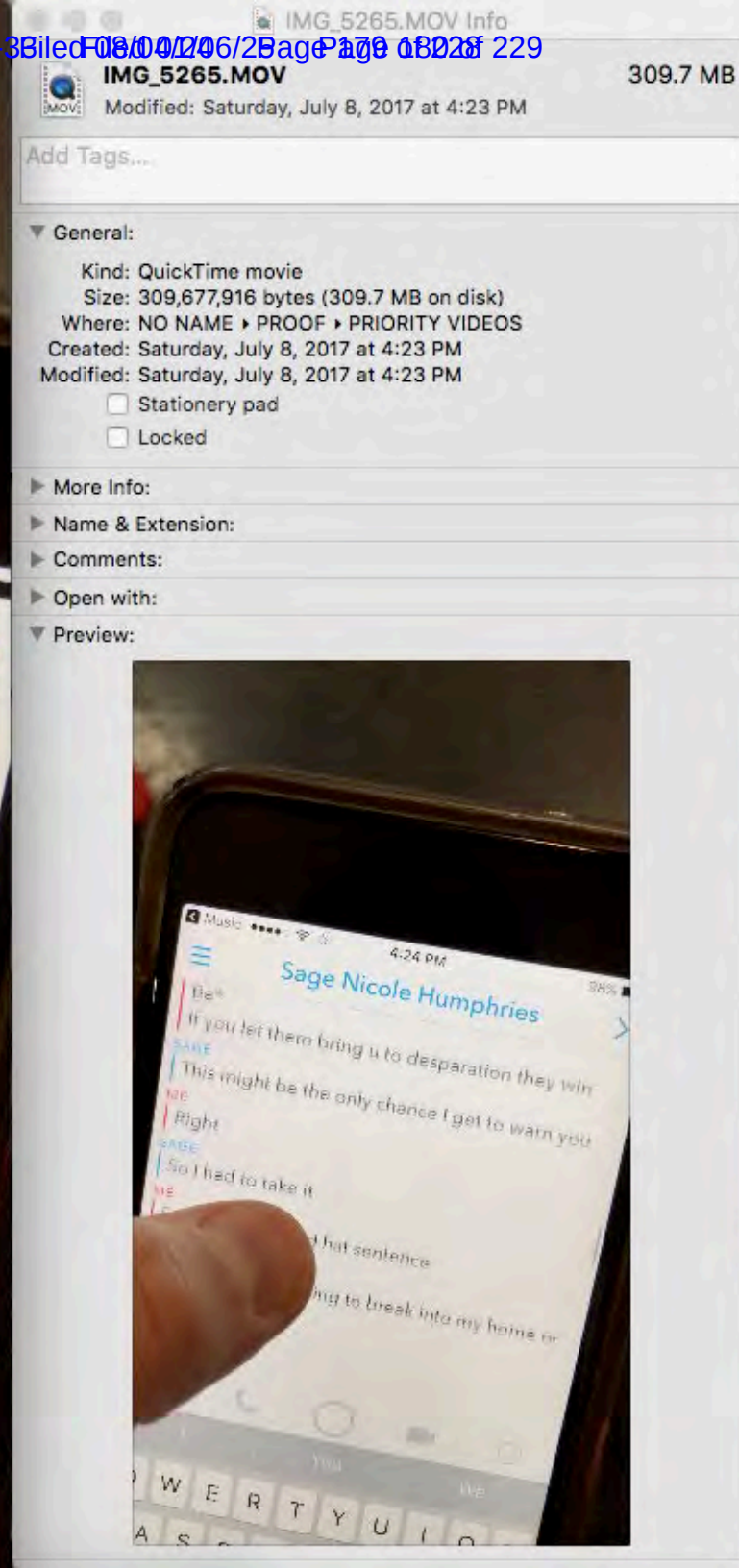
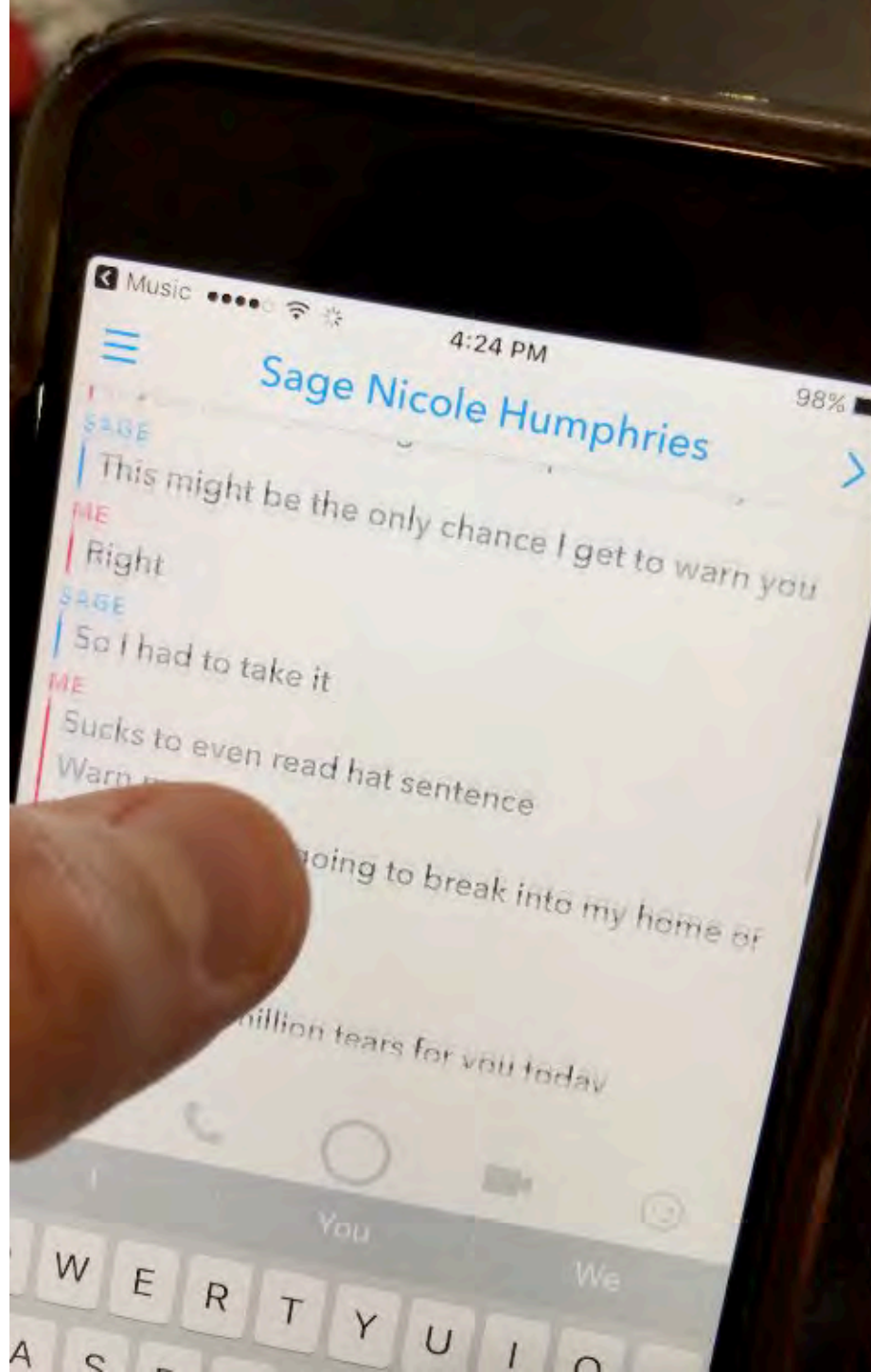
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► Open with:

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Modified: Saturday, July 8, 2017 at 4:23 PM

309.7 MB

Add Tags...

## ▼ General:

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Created: Saturday, July 8, 2017 at 4:23 PM

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☐ Stationery pad☐ Locked

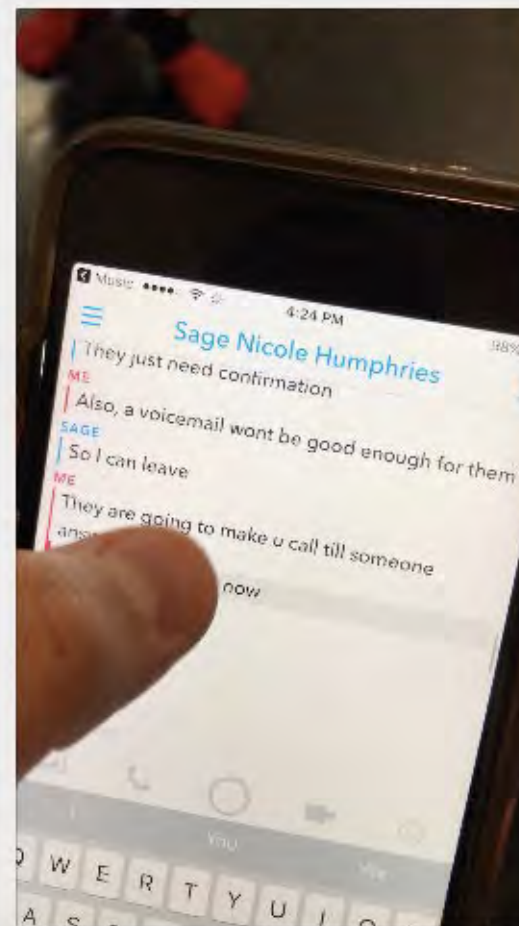
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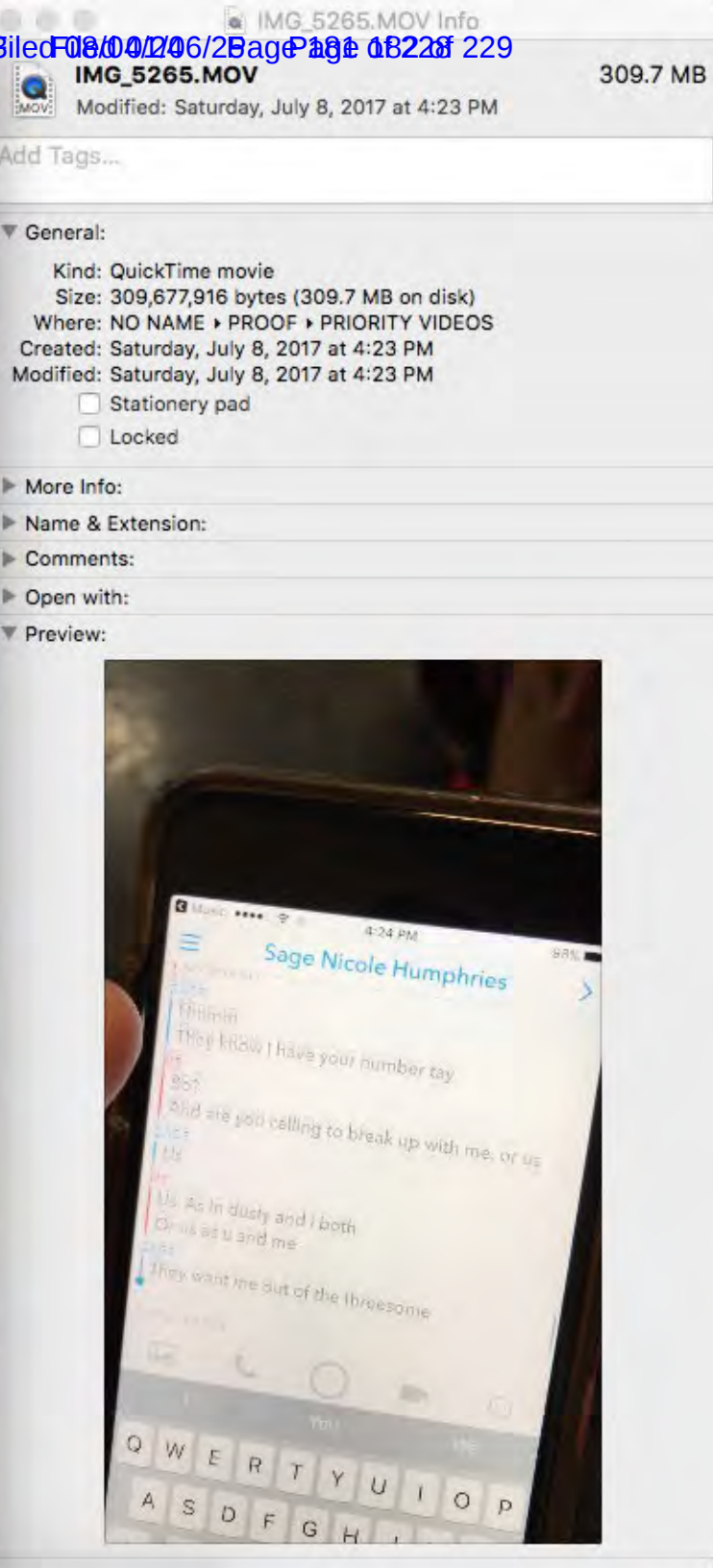
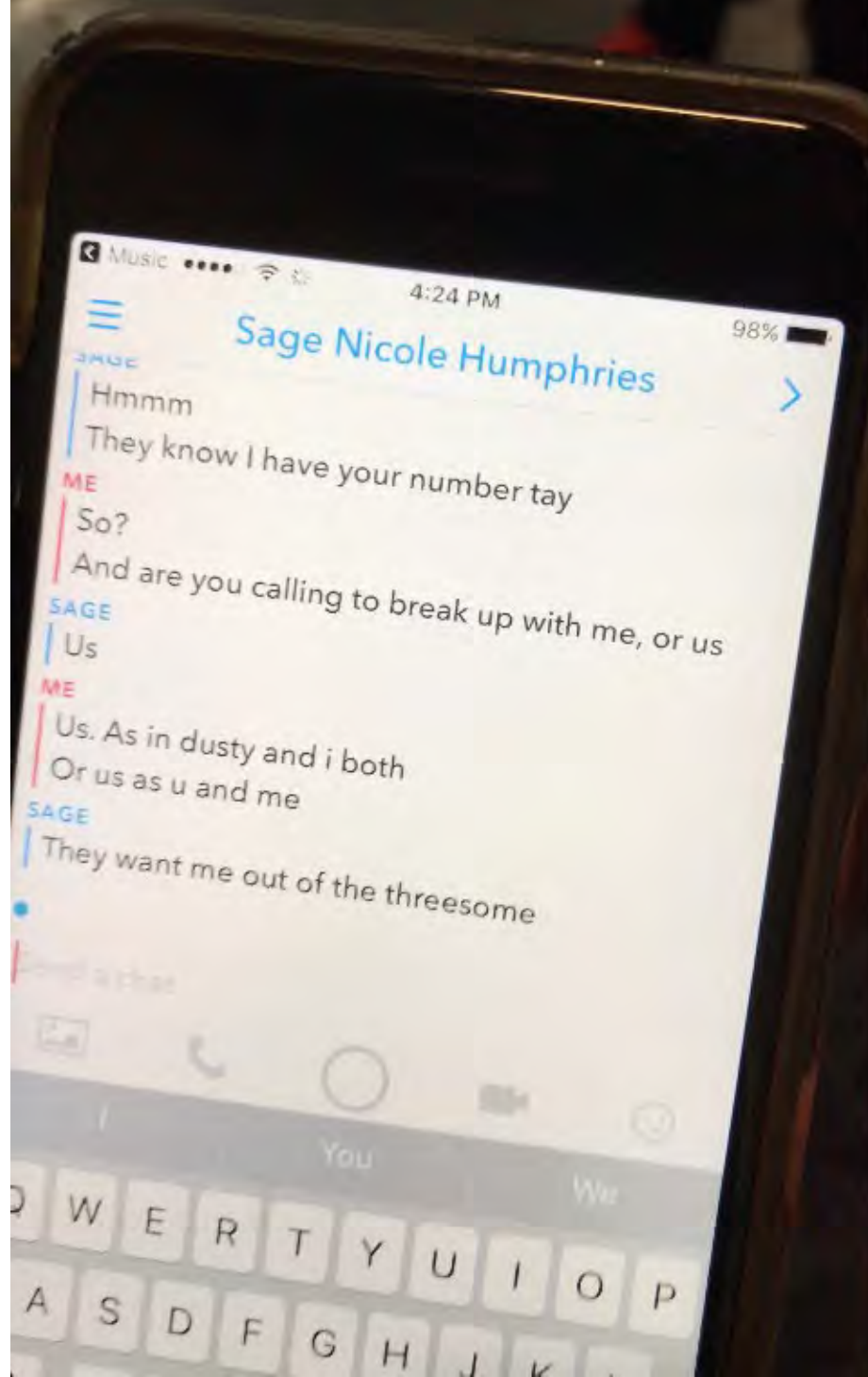
► Comments:

► Open with:

## ▼ Preview:







# EXHIBIT F

+15627 [REDACTED] Sage Nicole Humphries May 23, 2017 12:52:48  
lol I just told Celso

+15627 [REDACTED] Sage Nicole Humphries May 23, 2017 12:54:12  
He thinks we are awesome

+15627 [REDACTED] Sage Nicole Humphries May 23, 2017 12:54:57  
He asked when you guys left if taylor was my boyfriend

+1562 [REDACTED] Sage Nicole Humphries May 23, 2017 12:55:16

And I said yes and talked about him for a while, and then he asked about Dusty and I just told him the truth haha

+1562 [REDACTED] Sage Nicole Humphries May 23, 2017 12:55:20

It feels so nice

+1617 [REDACTED] Tay May 23, 2017 12:55:42

How did he react?

+1562 [REDACTED] Sage Nicole Humphries May 23, 2017 12:56:36

He was so supportive

+1562 [REDACTED] Sage Nicole Humphries May 23, 2017 12:56:54

He's like; "I totally understand it's like a triangle love"

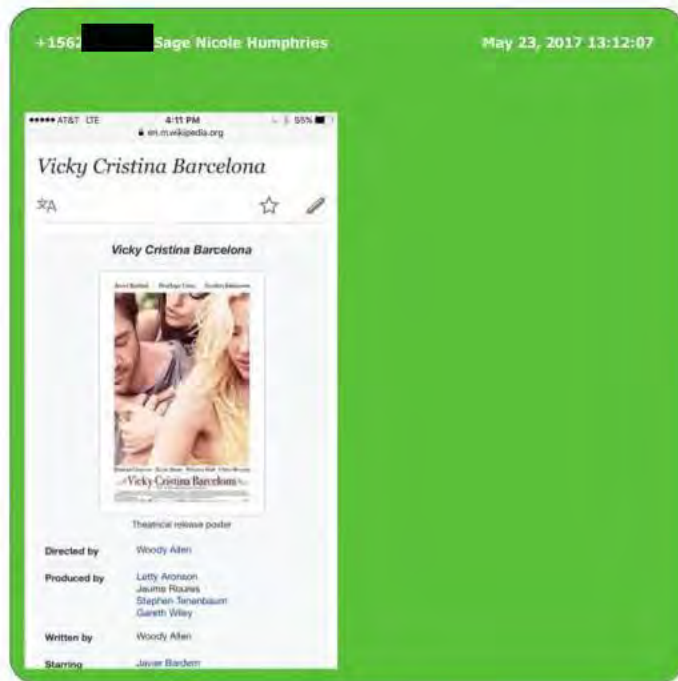
+1562 [REDACTED] Sage Nicole Humphries May 23, 2017 12:57:13

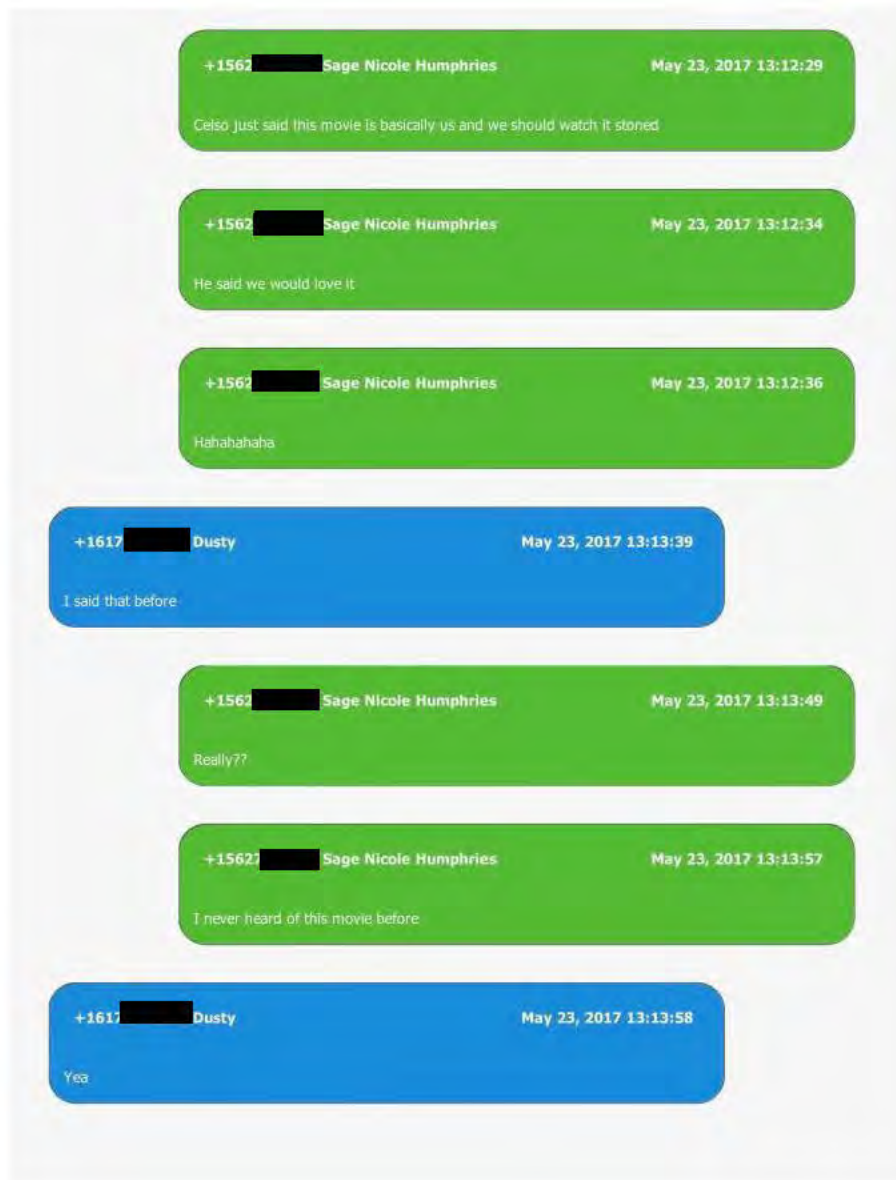
And I was all... exactly 🤔

+1617 [REDACTED] Tay May 23, 2017 12:58:24

Haha









# EXHIBIT G



# Humphries et al v. Button Order on Motion to Dismiss

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

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**United States District Court**

**District of Nevada**

## **Notice of Electronic Filing**

The following transaction was entered on 2/17/2023 at 12:08 PM PST and filed on 2/17/2023

**Case Name:** Humphries et al v. Button

**Case Number:** [2:21-cv-01412-ART-EJY](#)

**Filer:**

**Document Number:** [131](#)

**Docket Text:**

**ORDER re ECF No. [69] - Based on the details herein and in light of the record as a whole, the Court denies Sage Humphries' Motion to Dismiss the counterclaim of defamation per se. Signed by District Judge Anne R. Traum on 2/17/2023. (Copies have been distributed pursuant to the NEF - CJS)**

# EXHIBIT H









# EXHIBIT I

# RANDAZZA

---

## LEGAL GROUP

Marc J. Randazza, JD, MAMC, LLM  
Licensed in AZ, CA, FL, MA, NV

29 July 2022

Via Email Only

<rklieger@hueston.com>

Robert N. Klieger  
Hueston Hennigan LLP  
523 West 6th Street, Suite 400  
Los Angeles, CA 90014

**Re: Humphries v. Button | Daryl Katz**

Dear Mr. Klieger:

I am writing in response to your letter dated July 14, 2022, the phone call we had on Sunday, July 17, 2022, and your letter dated July 24, 2022. I appreciate the time you have taken to discuss this matter.

First, I want to reiterate that we regret needing to bring Mr. Katz into this dispute, but this firm's duty to our clients requires that we pursue all options to defend our clients' interests. To that end, the Buttons' contribution claim against Mr. Katz remains both viable and necessary. In your letter, you point out that Nevada law does not recognize the sort of contribution claim that is brought in the Buttons' Third Party Complaint. We concede that this is true. However, this claim is brought under Massachusetts law, and not Nevada law.

Under Massachusetts law, there is no similar bar against a contribution claim arising from an intentional tort. See Mass. Gen. Laws ch. 231B; see also *Thomas v. EDI Specialists, Inc.*, 437 Mass. 536, 538-39 (2002). Specifically, Massachusetts's contribution statute states:

Except as otherwise provided in this chapter, where two or more persons become jointly liable in tort for the same injury to person or property, there shall be a right of contribution among them even though judgment has not been recovered against all or any of them.

Mass. Gen. Laws ch. 231B § 1(a); see also *Thomas*, 437 Mass. at 538-39 (noting that "[t]he language of the statute does not distinguish between intentional torts and negligence" and that this statutory right of contribution "is not limited to those causes of action that existed when the statute became effective"). Additionally, the Third Party Complaint for contribution against Katz is timely:

2764 Lake Sahara Drive, Suite 109, Las Vegas, Nevada 89117

mjr@randazza.com | 702.420.2001



(a) Whether or not judgment has been entered in an action against two or more tortfeasors for the same injury, contribution may be enforced by separate action. ...

(d) If there is no judgment for the injury against the tortfeasor seeking contribution, his right of contribution shall be barred unless he has either (1) discharged by payment the common liability within the statute of limitations period applicable to claimant's right of action against him and has commenced his action for contribution within one year after payment, or (2) agreed while action is pending against him to discharge the common liability and has within one year after the agreement paid the liability and commenced his action for contribution.

Mass. Gen. Laws ch. 231B § 3.

I have reviewed your research on Massachusetts law, and I respectfully disagree with your legal conclusions. Please consider:

*Callahan v. A. J. Welch Equip. Corp.*, 36 Mass. App. Ct. 608, 609 (1994):

The worker broke his leg and brought an action against the contractor and the excavator. The contractor filed claims for indemnity against the subcontractor and the excavator, which then cross-claimed for contribution. After the worker settled his claim against the contractor and the excavator, all that remained were the indemnity and contribution claims. Based on the jury's findings that the contractor was negligent and its negligence was the proximate cause of the accident and that both the subcontractor and the excavator "caused" the accident, the trial court ruled in part that the contractor was entitled to indemnification and that the excavator was entitled to contribution from the subcontractor. The subcontractor appealed.

Also, consider *Hopper Feeds, Inc. v. Cincinnati Milacron, Inc.*, 411 Mass. 273, 277 (1991):

Where two or more persons become jointly liable in tort, Mass. Gen. Laws ch. 231B, § 1, creates a right of contribution among them. Mass. Gen. Laws ch. 231B, § 3, sets forth two alternative methods by which a party entitled to contribution can enforce that right. First, Mass. Gen. Laws ch. 231B, § 3(a) provides: Whether or not judgment is entered in an action against two or more tortfeasors for the same injury, contribution may be enforced by separate action. Section



3(a) creates a separate cause of action for contribution, enabling a party to seek contribution from other alleged joint tortfeasors who were not joined as defendants in the original action. Alternatively, Mass. Gen. Laws ch. 231B § 3(b) provides: Where a judgment is entered in an action against two or more tortfeasors for the same injury, contribution may be enforced in that action by judgment in favor of one against other judgment defendants by motion upon notice to all parties to the action. This section sets forth a simpler procedure by which a party can assert its contribution claims by motion against parties who were joined as defendants in the original action and against whom judgment has already been entered.

In other words, it seems that we are **compelled** to bring our cross claims now – as a jury would need to find that the two parties are jointly liable. It makes no sense to interpret this as meaning that first there must be a trial on the Buttons' liability, and then the Buttons bring a whole new claim against joint tortfeasors. In order for a party to be liable for a cross-claim for contribution, a jury must find that the two parties are jointly liable. *MacIsaac v. Magic World Balloony Inc.*, No. WOCV2011-00848A, 2013 Mass. Super. LEXIS 1734, \*15 (Dec. 2, 2013). In *Rush v. Norfolk Elec. Co.*, 70 Mass. App. Ct. 373 (2007) there was a *fourth* party complaint by a third party defendant seeking contribution – before there was payment or adjudication.

The defendants are convinced that **perhaps** Ms. Humphries is emotionally damaged by her unconventional sexual relationships. However, to whatever extent her relationship with the Buttons caused her damage, it is inconceivable that the relationship she had with Katz (and the other cross-defendants) did not contribute to, if not entirely create, that emotional damage. Thus, they should be considered to be joint tortfeasors, and a cross claim for contribution is valid under Massachusetts law. See *Sanderson v. Benedetto*, No. 91-2483-D, 1993 Mass. Super. LEXIS 64, \*22-23, 1993 WL 818656 (Oct. 14, 1993).

Here, Ms. Humphries and the Buttons were residents of Massachusetts both during Ms. Humphries's relationship with Mr. Katz and during the time period in which Ms. Humphries claims that the Buttons abused her. For those reasons, Massachusetts law applies to the Buttons' contribution claim.

Aside from the validity of the claim, the factual allegations likewise seem true based upon the credible testimony of my clients and the evidence that I have reviewed. By way of explanation, the Buttons possess a trove of evidence compiled from an iPhone backup that Sage Humphries left on one of their hard

Humphries v. Button | Daryl Katz  
Page 4 of 8

**RANDAZZA**  
LEGAL GROUP

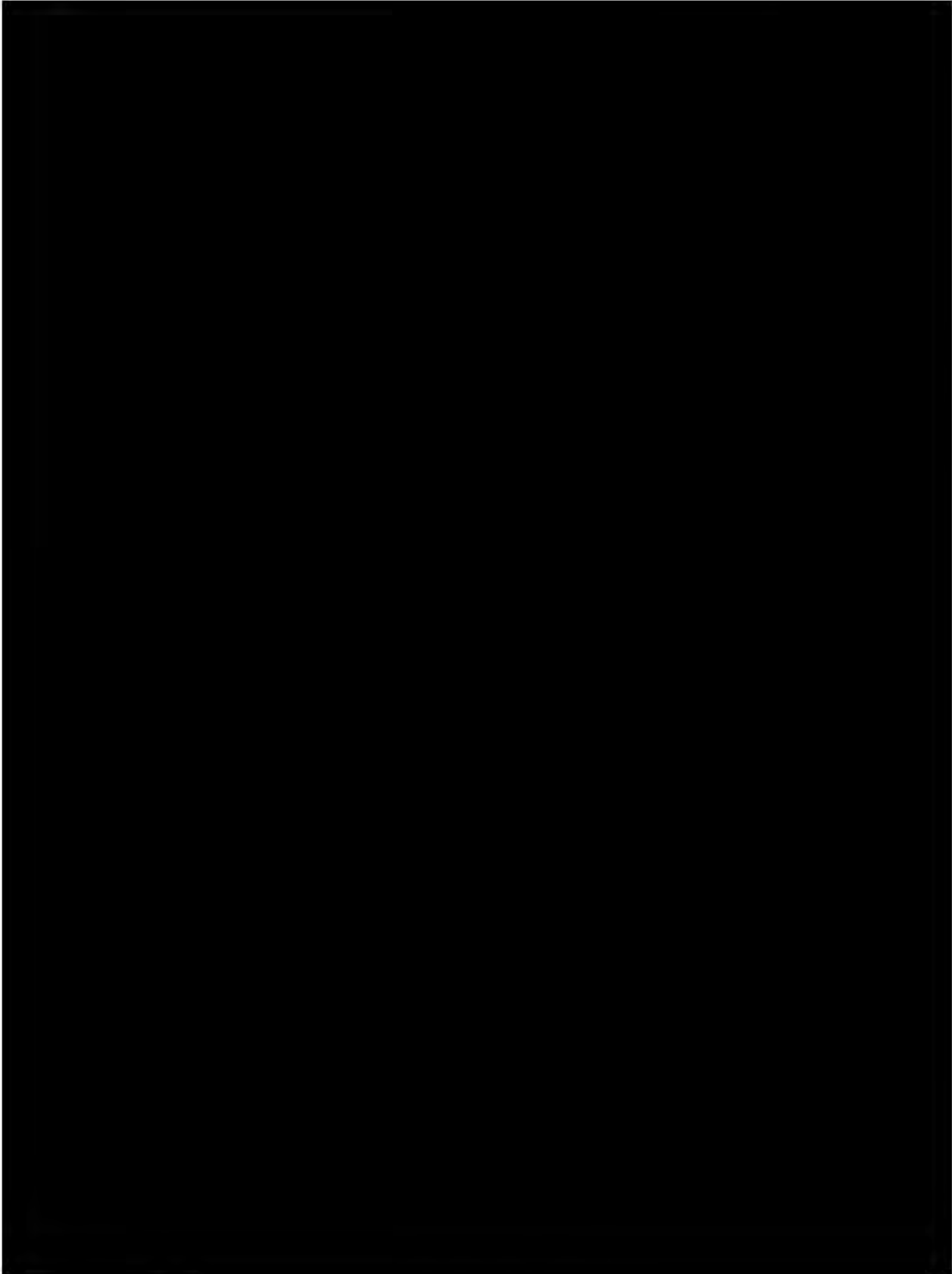
[REDACTED]

[REDACTED]

[REDACTED]

Humphries v. Button | Daryl Katz  
Page 5 of 8

**RANDAZZA**  
LEGAL GROUP





[REDACTED]  
[REDACTED] I have enclosed declarations from both Dusty and Mitchell Button wherein they attest under penalty of perjury as to their knowledge of statements made by Ms. Humphries herself which support the facts alleged.

The representations you made in your letter and repeatedly in the press alleging that Sage and Katz were solely in some sort of business relationship are false. I do not necessarily attribute this to you, however; it is possible that you were simply misinformed by your client. However, should you present these false allegations in court, we will have no choice but to litigate the truth of this matter. In contrast to the evidence-free denials that you have given to the press, our clients have the proof to back up their claims.

As an additional fact, we do not agree with your assessment that Sage's date of birth is October 3, 1997. Instead, the Buttons understand that Sage was born in 1998, supporting the allegations that she was underage when she met Katz. If you have supporting documentation to dispute this assertion, we will certainly take that under advisement and will absolutely correct our pleading with respect to this fact. However, our clients had no reason to doubt Ms. Humphries when she attested to the fact that she was born in 1998. Nevertheless, this seems like an easily-provable fact, and should Sage have lied to our clients about her age, that should not be Mr. Katz' problem – and we will correct that.

I would like to address your comments to the press on this matter. We have no desire to harm Mr. Katz' reputation. In fact, to the contrary, our statements to the press have been "we are not trying this matter in the press." I also note that you have referred to this as a "shakedown" – but perhaps we assign different meanings to that word. I would perhaps agree that it is a "shakedown" if the Buttons had asked for any money from Mr. Katz – for themselves. But here, the only intent is to ensure that if Ms. Humphries is, indeed, emotionally damaged from her lifestyle choices, and that her partners in those choices are therefore liable, that the cost of the relative damage be fairly apportioned to all who participated in it.

We understand that Mr. Katz denies having a sexual relationship with Ms. Humphries. We believe that the evidence we have discovered thus far tells a different story. While we realize that Ms. Humphries may not have the most intact integrity, it is a fact that she told the Buttons that she was sleeping with Mr. Katz, and that is what the money was for. We applied some skepticism to this, until we saw the text messages. Further, we are aware that there is at least one other pay-for-sex allegation in the press, and while we did not give that the same weight as actual evidence, it certainly contributed to our reasonable belief that the story is true. I will also report that I personally received a mysterious phone call from a very nervous individual who claimed to have information about "dozens" of other

women with the same story. I am obviously giving that the weight it currently deserves – as it could be someone with a vendetta against Katz, or it could even be someone with a vendetta against me, who is trying to set me up for failure. In fact, it could be an agent of Katz who is trying to set me up to be discredited. Accordingly, I will be chasing that thread further, but I am telling you this in the interest of full disclosure. Mr. Katz knows better than anyone if this call was clearly someone spreading falsehoods, or if the allegations this caller made have any weight at all.

I sincerely respect that you are a strong and unwavering advocate for your client. However, I believe that the consistent threats are not helpful. In fact, if you are going to back us into a corner, what would you have us do? Do you think that based on the facts reported to you here (and further developing as we go through the data we have) and our legal position, that this was truly beneath the requirements of Rule 11?

I further respect how you have tried to change the press narrative on this matter. Again, you have a client to defend, both in court and in the court of public opinion. However, I hope you have also seen that we have not said a single thing to smear Mr. Katz, and in looking at the texts we gave you in this letter, I hope that you see that we only filed what we felt was necessary to automatically refute a Rule 11 motion. We found no need to do a full data dump. What you should take from that is perhaps to find a desire to work a little more collaboratively with us, and not to attack us at every juncture.

Despite all of the above, we are not rejecting out of hand any resolution to this matter – and we continue to entertain your request that we drop the matter without prejudice, with a tolling agreement. We remain concerned that doing so would unreasonably prejudice our clients. But, the channels of communication are open for you to persuade us otherwise.

The thing that may close these channels of communication will be the continued threats of unreasonable claims against our clients or our firm. We brought this cross claim in good faith, to serve our clients' interests – as we are bound to do. We conducted a more-than-good-faith investigation into the facts and the law. We further required our clients to swear to all of this under penalty of perjury. We did not ask for a dime from Mr. Katz, for our clients or ourselves. We did not seek the limelight that this case attracted. In fact, we would very much like the press attention on it to go away – just as much as you do. There seems to be only one person involved in this who is enjoying the public's gaze upon the matter – and we have no control over her.

Humphries v. Button | Daryl Katz  
Page 8 of 8

**RANDAZZA**  
LEGAL GROUP

We remain open to speaking with you about this matter further and trying to find a creative solution to it. But, I do suggest that Mr. Katz re-evaluate his mistaken belief that he is involved in this for a bad-faith reason. I'm a lawyer doing my job, just like you. And I believe my clients' stories, just like you believe your client's denials. At some point, the truth (which is always somewhere in the middle) may need to be adjudicated by a trier of fact.

We appreciate your attention to this matter, and I look forward to another call with you, at your convenience.

Sincerely,



Marc J. Randazza

cc: Clients (via separate email)

encl: Declarations



Marc J. Randazza, NV Bar No. 12265  
 Ronald D. Green, NV Bar No. 7360  
 Alex J. Shepard, NV Bar No. 13582  
 RANDAZZA LEGAL GROUP, PLLC  
 2764 Lake Sahara Drive, Suite 109  
 Las Vegas, Nevada 89117  
 Telephone: 702-420-2001  
 Email: ecf@randazza.com  
 Attorneys for Defendants  
 Mitchell Taylor Button and Dusty Button

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

SAGE HUMPHRIES, GINA MENICHINO,  
 ROSEMARIE DeANGELO, DANIELLE  
 GUTIERREZ, and JANE DOE 100, JULIET  
 DOHERTY, and JANE DOE 200

Case No. 2:21-cv-01412-ART-EJY

**DECLARATION OF  
 DUSTY BUTTON**

Plaintiffs/  
 Counterclaim Defendants,

v.

MITCHELL TAYLOR BUTTON and  
 DUSTY BUTTON

Defendants/  
 Counterclaim Plaintiffs /  
 Third Party Plaintiffs,

v.

MICHAEL S. HUMPHRIES, MICAH L.  
 HUMPHRIES, ANTHONY GIOVANNI  
 DEANE, DARYL ALLAN KATZ, and  
 CHASE FINLAY,

Third Party Defendants.

**DECLARATION OF DUSTY BUTTON**

I, Dusty Button, declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness could and would testify competently thereto.

2. I am a Defendant, Counterclaim Plaintiff, and Third Party Plaintiff in the above-captioned proceeding.

3. I make this declaration to clarify my understanding of Daryl Katz's relationship with Sage Humphries, a Plaintiff and Counterclaim Defendant in this action.

4. Based on my conversations with Sage Humphries, a review of text messages between Katz and Sage, and my knowledge of public accusations against Katz by third parties, I fully believe that Katz and Sage were in a sexual relationship, and that Katz was paying Sage for sex, whether explicitly or implicitly.

5. Sage told me that she had been seeing a billionaire and did not disclose his name.

6. The first time Sage mentioned the "billionaire," she told me that she was seeing someone, although she was then already engaged in a separate relationship.

7. Sage told me that she had met Katz at a modeling party when she was invited along with other models as entertainment, where he had taken a liking to her and informed her of his vast network of celebrity and industry friends, one of which she boasted about the most to be Leonardo DiCaprio. She also stated Katz told her that he could introduce her to Leo and that he could do a lot to benefit her career.

8. I eventually came to understand that Sage was not romantically interested in this Katz, and that she was only interested in how he promised to further her career, whether that was by giving her money, introducing her to his wealthy and famous contacts, or by placing her in movies.

9. From what Sage had explicitly told me, I understand that Sage was frequently traveling from Boston to New York City to spend time with Katz.

- 2 -

Declaration of Dusty Button  
2:21-cv-01412-APG-EJV

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1           10.     At various times, Sage told me explicitly that she was sleeping with this un-named  
2     billionaire.

3           11.     On one occasion, Sage admitted to me that she had “fucked” a billionaire.  
4     Specifically, I was playing a game of “Never Have I Ever” with Sage, and the prompt “never have  
5     I ever fucked a billionaire” arose. Sage made a show of lowering one of her fingers in response,  
6     signaling that she had indeed “fucked” a billionaire.

7           12.     During the course of their relationship, to the best of my knowledge and according  
8     to Sage’s own statements, she was 17 years old. [REDACTED]

9     [REDACTED]  
10    [REDACTED]  
11           13.     Sage would tell me that she had to do “favors” to appease the ‘billionaire’ so he  
12     would continue to give her the money to produce her own movie, a movie that she said he would  
13     set up for her because he had connections.

14           14.     She referred to the money Katz gave her as “donations.”

15           15.     On at least one occasion, in reference to her relationship with Katz, Sage told me:  
16     “sometimes you have to do favors to get what you want.” I understood this very clearly to mean  
17     that Sage was performing sexual favors on Katz in exchange for money.

18           16.     In the course of preparing documents in this case, my husband and I discovered that  
19     we had in our possession an iPhone backup of Sage Humphries’s phone that she uploaded to our  
20     personal hard drive in order to preserve the content from her phone before she returned it to her  
21     service provider upon receiving her upgrade. She was 7 days late returning her old device, causing  
22     the service provider to charge her account over \$1,000. It became urgent, then, for her to save her  
23     data and return the old phone to remedy the charge on the account.

24           17.     Upon discovering that this folder was Sage’s backup on our hard drive, we then  
25     discovered [REDACTED]

26     [REDACTED]

18. [REDACTED]

19. After researching Katz, I discovered that an actress, Greice Santo, had publicly alleged that Katz offered her money and movie roles in exchange for companionship and sex, leading me to the concrete belief that this was a pattern that Katz was engaged in.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07 / 19 / 2022.



Dusty Button

Marc J. Randazza, NV Bar No. 12265  
 Ronald D. Green, NV Bar No. 7360  
 Alex J. Shepard, NV Bar No. 13582  
 RANDAZZA LEGAL GROUP, PLLC  
 2764 Lake Sahara Drive, Suite 109  
 Las Vegas, Nevada 89117  
 Telephone: 702-420-2001  
 Email: ecf@randazza.com  
 Attorneys for Defendants  
 Mitchell Taylor Button and Dusty Button

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

SAGE HUMPHRIES, GINA MENICHINO,  
 ROSEMARIE DeANGELO, DANIELLE  
 GUTIERREZ, and JANE DOE 100, JULIET  
 DOHERTY, and JANE DOE 200

Case No. 2:21-cv-01412-ART-EJY

**DECLARATION OF  
 MITCHELL TAYLOR BUTTON**

Plaintiffs/  
 Counterclaim Defendants,

v.

MITCHELL TAYLOR BUTTON and  
 DUSTY BUTTON

Defendants/  
 Counterclaim Plaintiffs /  
 Third Party Plaintiffs,

v.

MICHAEL S. HUMPHRIES, MICAH L.  
 HUMPHRIES, ANTHONY GIOVANNI  
 DEANE, DARYL ALLAN KATZ, and  
 CHASE FINLAY,

Third Party Defendants.

**DECLARATION OF MITCHELL TAYLOR BUTTON**

I, Mitchell Taylor Button, declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness could and would testify competently thereto.

2. I am a Defendant, Counterclaim Plaintiff, and Third Party Plaintiff in the above-captioned proceeding.

3. I make this declaration to clarify my understanding of Daryl Katz's relationship with Sage Humphries, a Plaintiff and Counterclaim Defendant in this action.

4. Based on my conversations with Sage Humphries, a review of text messages between Katz and Sage, and my knowledge of public accusations against Katz by third parties, I fully believe that Katz and Sage were in a sexual relationship, and that Katz was paying Sage for sex, whether explicitly or implicitly.

5. Sage told me that she had been seeing a billionaire and did not disclose his name.

6. The first time Sage mentioned the "billionaire," she told me that she was seeing someone, although she was then already engaged in a separate relationship.

7. Sage told me that she had met Katz at a modeling party when she was invited along with other models as entertainment, where he had taken a liking to her and informed her of his vast network of celebrity and industry friends, one of which she boasted about the most to be Leonardo DiCaprio. She also stated Katz told her that he could introduce her to Leo and that he could do a lot to benefit her career.

8. I eventually came to understand that Sage was not romantically interested in this Katz, and that she was only interested in how he promised to further her career, whether that was by giving her money, introducing her to his wealthy and famous contacts, or by placing her in movies.

9. From what Sage had explicitly told me, I understand that Sage was frequently traveling from Boston to New York City to spend time with Katz.

- 2 -

Declaration of Mitchell Taylor Button  
2:21-cv-01412-APG-EJV

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1           10.     At various times, Sage told me explicitly that she was sleeping with this un-named  
2 billionaire.

3           11.     On one occasion, Sage admitted to me that she had “fucked” a billionaire.  
4 Specifically, I was playing a game of “Never Have I Ever” with Sage, and the prompt “never have  
5 I ever fucked a billionaire” arose. Sage made a show of lowering one of her fingers in response,  
6 signaling that she had indeed “fucked” a billionaire.

7           12.     During the course of their relationship, to the best of my knowledge and according  
8 to Sage’s own statements, she was 17 years old. [REDACTED]

9 [REDACTED]  
10 [REDACTED].

11           13.     She referred to the money Katz gave her as “donations.”

12           14.     On at least one occasion, in reference to her relationship with Katz, Sage told me:  
13 “sometimes you have to do favors to get what you want.” I understood this very clearly to mean  
14 that Sage was performing sexual favors on Katz in exchange for money.

15           15.     In the course of preparing documents in this case, my wife and I discovered that we  
16 had in our possession an iPhone backup of Sage Humphries’s phone that she uploaded to our  
17 personal hard drive in order to preserve the content from her phone before she returned it to her  
18 service provider upon receiving her upgrade. She was 7 days late returning her old device, causing  
19 the service provider to charge her account over \$1,000. It became urgent, then, for her to save her  
20 data and return the old phone to remedy the charge on the account.

21           16.     Upon discovering that this folder was Sage’s backup on our hard drive, we then  
22 discovered [REDACTED]

23 [REDACTED].

24           17.     [REDACTED]  
25 [REDACTED]

1           18.     After researching Katz, I discovered that an actress, Greice Santo, had publicly  
2 alleged that Katz offered her money and movie roles in exchange for companionship and sex,  
3 leading me to the concrete belief that this was a pattern that Katz was engaged in.

4           I declare under penalty of perjury that the foregoing is true and correct.

5           Executed on: 07 / 19 / 2022.

6 

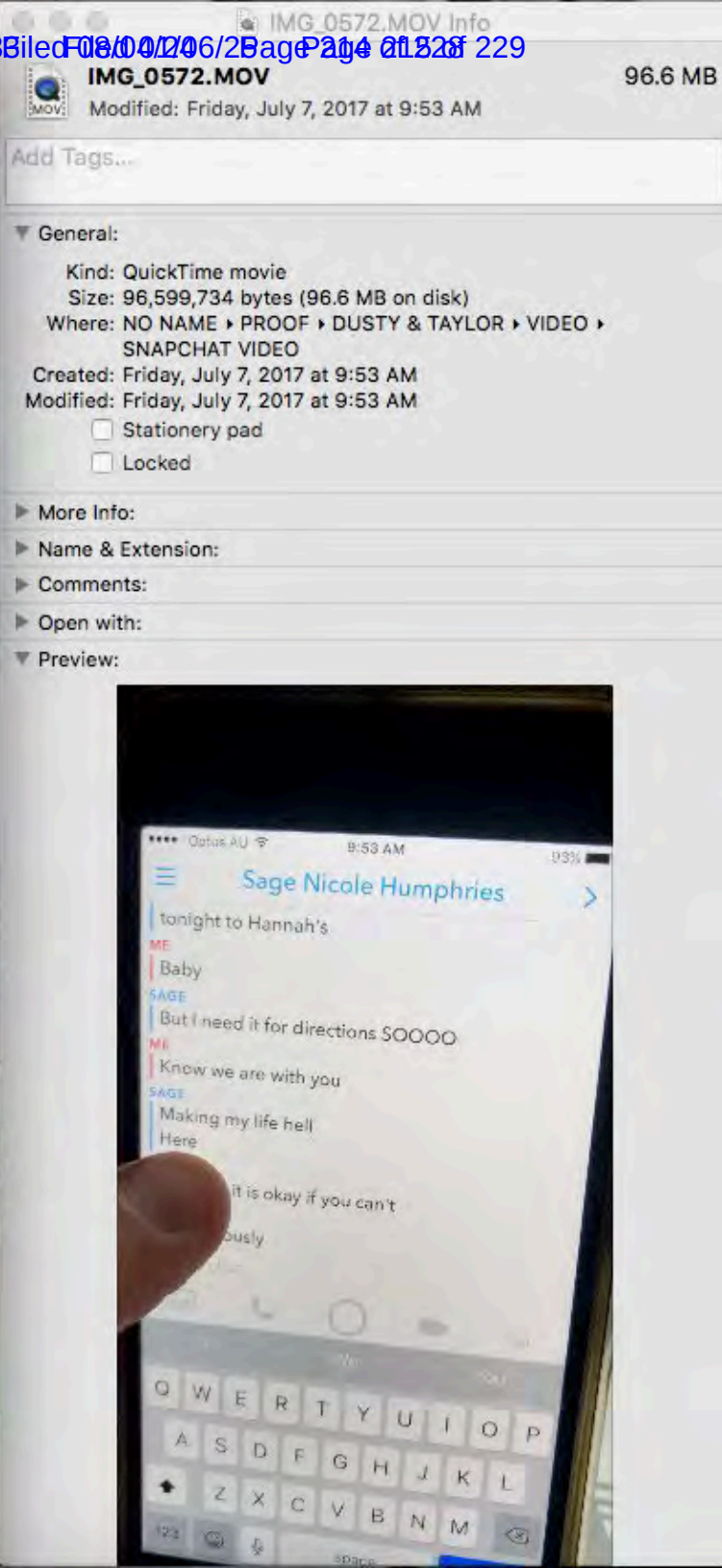
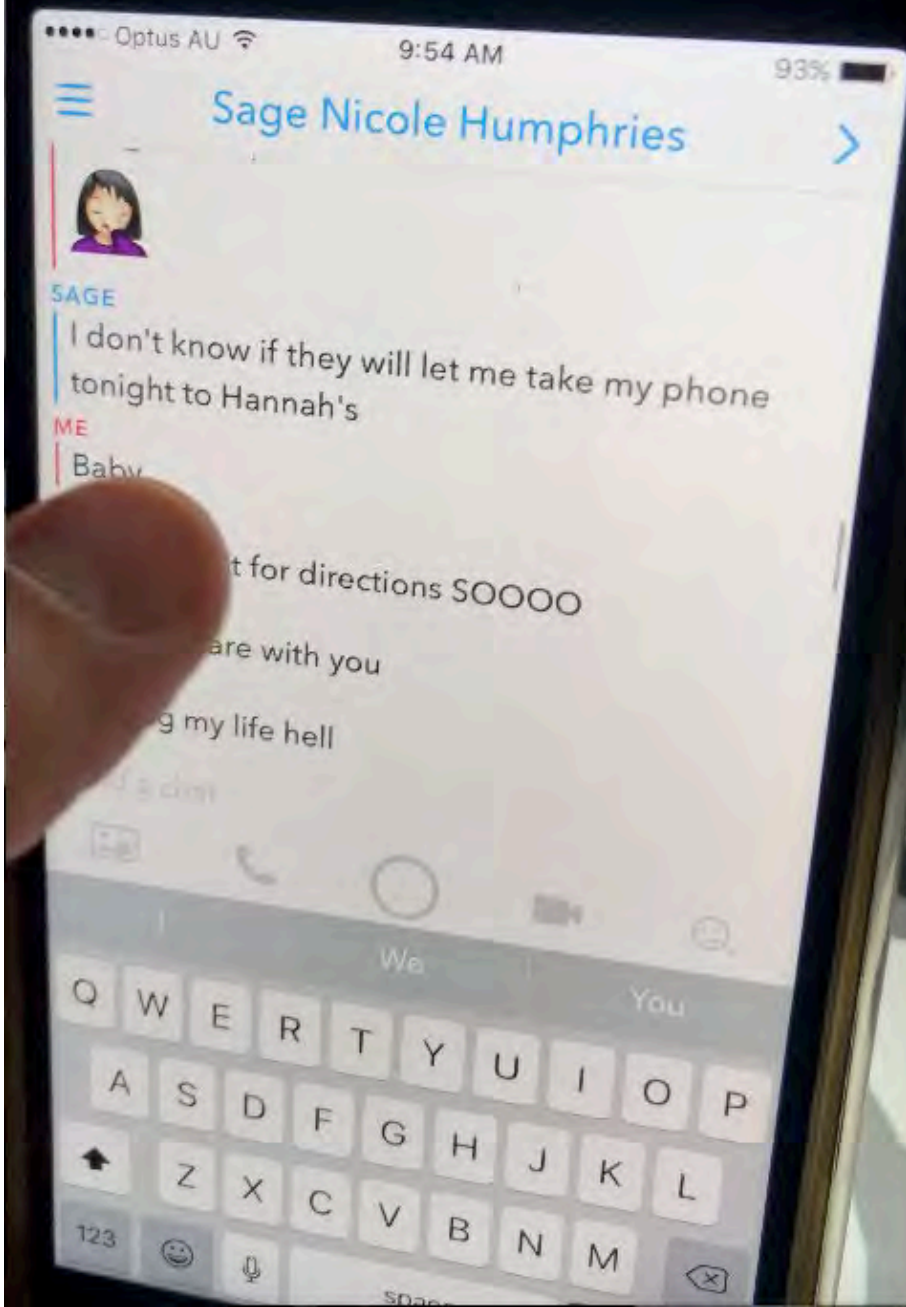
7 \_\_\_\_\_  
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# EXHIBIT J



# EXHIBIT K







# EXHIBIT L

BEDFORD POLICE DEPARTMENT INCIDENT REPORT									
1. CAD Event Number 23-019730		2. ORI NO NH0050696		3. Phone Number 603-472-5113		4. Other Agency Case #		5. Department Case Number 2023-018418	
CRIME / INCIDENT INFORMATION									
7. Incident Date 07/24/2023		8. Incident Time 1014 Hrs		9. Loc. of Crime/Incident (Reg - Street) [REDACTED]		10. City BEDFORD		11. County HILLSBOROUGH	
						12. State NH		13. Zip 03110	
								14. Location Zone S1	
15. No. 1		16. RSA [REDACTED]		17. Crime Incident ASSIST OTHER AGENCY				18. Degree [REDACTED]	
PERSON(S) INVOLVED									
19. Type CONTACT		20. Name (Last) [REDACTED]		21. First [REDACTED]		22. Middle [REDACTED]		23. Home Phone / Cell [REDACTED]	
24. Full Address (Rt. and Apt/Suite) [REDACTED]		25. City BEDFORD		26. County HILLSBOROUGH		27. State NH		28. Zip 03110	
29. Mailing Address (if different than above) [REDACTED]									
30. Social Security No. [REDACTED]		31. DOB [REDACTED]		32. Age 26		33. Sex FEMALE		34. Race WHITE	
								35. Driver's License # / State [REDACTED] / NH	
VEHICLE(S) INVOLVED									
36. State [REDACTED]		37. JOG Reg. Number [REDACTED]		38. JOG Lic. Type (LT) [REDACTED]		39. Year [REDACTED]		40. Model [REDACTED]	
						41. Body Type [REDACTED]		42. Color [REDACTED]	
								43. Vehicle Identification Number [REDACTED]	
NARRATIVE / GIST									
<p>On July 24, 2023, dispatch advised that they were in receipt of an email from the Manchester Police Department referencing [REDACTED]</p> <p>The email was written by a Dusty and Taylor Burton (unknown DOB), stated that they had deposed:</p> <p>[REDACTED]</p> <p>Bedford, NH</p> <p>for a federal civil case [REDACTED] stated under oath that she had informed [REDACTED] who is identified in the email as [REDACTED] Thon's [REDACTED]</p> <p>[REDACTED]</p> <p>The email stated that as this was stated under oath it would still require an investigation.</p> <p>Thon's is currently employed at:</p> <p>[REDACTED] Counseling 250 Commercial Street Ste//2011 Manchester, NH [REDACTED]</p> <p>I request that this case be handed over to the Bedford Police Department Detective Division for further investigation.</p> <p>FTO Kennedy</p>									
Print Name / Name: OFF. STEPHEN KENNEDY JR. ID#C13				Page No. 1 of 2		Report Date: 07/24/2023		Reviewed By: SGT. DANIELLE NIGHTINGALE, ID#24	
Signature: Stephen Kennedy								Supervisor Signature: [REDACTED]	

Case No. 2023-018418

1. CAD Event Number 23-019730	2. ORI NO NH000000	3. Phone Number 603-472-5113	4. Other Agency Number	5. Department Case Number 2023-018418
<p><b>Report Narrative:</b> On Monday, July 24, 2023, at approximately 0930 hours, I was forwarded an email from the following individual,</p> <p>Armina Adzie Communications Supervisor Manchester Police Department The Michael Briggs Safety Complex 405 Valley Street Manchester, NH 03103</p> <p>labeled as, <i>Police Report for</i> [REDACTED] from the following individuals,</p> <p>Dusty and Taylor Button Boston, Massachusetts [REDACTED]</p> <p>The Buttons reported that an individual who they identified as,</p> <p>[REDACTED] Bedford, NH 03110</p> <p>and/or of</p> <p>[REDACTED] Boston, MA</p> <p>who they deposed as part of an ongoing federal civil case, disclosed to her therapist,</p> <p>[REDACTED] Thonis Clinical Social Worker Mills Creek Counseling [REDACTED]</p> <p>that [REDACTED] The Buttons also reported that [REDACTED] was a minor at the time of her disclosure [REDACTED]</p> <p>The Buttons alleged that [REDACTED] could have provided false testimony under oath but noted that they felt an obligation to report the allegation as it would warrant an investigation.</p> <p>The Buttons stated that [REDACTED] reported to have been residing at the Bedford, NH address at the time of [REDACTED] and did not indicate in any way that it occurred at that location. It appeared to me that they were requesting an investigation be conducted by the Manchester Police Department regarding Thonis' [REDACTED]</p>				
Print Name / Name OFF. STEPHEN KENNEDY JR, ID#018	Page No 2 of 2	Report Date 8/14/2023	Reviewed By SGT. DANIELLE NIGHTINGALE, ID#24	Supervisor Signature [Signature]

BEDFORD POLICE DEPARTMENT CONTINUATION PAGE REPORT				
1. CAD Event Number 23-019730	2. ORI NO NH000000	3. Phone Number 603-472-5113	4. Other Agency Case #	5. Department Case Number 2023-018418
NARRATIVE				
<p><b>Report Narrative:</b> On Monday, July 24, 2023, at approximately 0930 hours, I was forwarded an email from the following individual,</p> <p>Armina Adzie Communications Supervisor Manchester Police Department The Michael Briggs Safety Complex 405 Valley Street Manchester, NH 03103</p> <p>labeled as, <i>Police Report for</i> [REDACTED] from the following individuals,</p> <p>Dusty and Taylor Button Boston, Massachusetts [REDACTED]</p> <p>The Buttons reported that an individual who they identified as,</p> <p>[REDACTED] Bedford, NH 03110</p> <p>and/or of</p> <p>[REDACTED] Boston, MA</p> <p>who they deposed as part of an ongoing federal civil case, disclosed to her therapist,</p> <p>[REDACTED] Thonis Clinical Social Worker Mills Creek Counseling [REDACTED]</p> <p>that [REDACTED] The Buttons also reported that [REDACTED] was a minor at the time of her disclosure [REDACTED]</p> <p>The Buttons alleged that [REDACTED] could have provided false testimony under oath but noted that they felt an obligation to report the allegation as it would warrant an investigation.</p> <p>The Buttons stated that [REDACTED] reported to have been residing at the Bedford, NH address at the time of [REDACTED] and did not indicate in any way that it occurred at that location. It appeared to me that they were requesting an investigation be conducted by the Manchester Police Department regarding Thonis' [REDACTED]</p>				
Print Name / Name DETECTIVE AMY CHAMPAGNE, ID#02	Page No 1 of 2	Report Date 8/08/2023	Reviewed By DS KEVIN SUTTER, ID#01	Supervisor Signature [Signature]

CAD Event Number 23-018418	ORI NO NH0000000	Phone Number 603-472-5113	Other Agency Case #	Department Case Number 2023-018418
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██████████ if what ██████████ testified under oath was true.

While reviewing the email it occurred to me that the Button surname was something that I had previously researched at the request of the following,

Evan Picariello  
Special Agent  
Homeland Security Investigations (HSI)  
Boston, MA

On Tuesday, January 18, 2022, at approximately 1553 hours, I corresponded with Special Agent Picariello who explained that he was assigned to the ██████████ and investigating several reports ██████████

Dusty Rachelle Button ██████████

Mitchell Taylor Moore; aka Mitchell Taylor Button; aka Taylor Button (██████████)

Special Agent Picariello stated that he was looking to identify a potential victim only known to him as Jane Doe ██████████

I conducted a search through the Bedford Police Department's Record Management System with negative results. I provided that information to Special Agent Picariello and that ended our contact.

Fast-forward to the present complaint, I recognized the connection and contacted Special Agent Picariello. He confirmed that the email I received was the result of the investigation he was involved in when he previously reached out to me. ██████████

He stated that although the criminal investigation did not result in charges, there is an ongoing civil litigation, and it appears that the Buttons are seeking any information pertaining to the plaintiffs in an effort to clear their names.

No crime occurred in Bedford.

Follow-up:  
None

██████████

Prepared By DETECTIVE AMY CHAMPAGNE, ID#03 <i>Amy Champagne</i>	Page No 2 of 2	Report Date 08/08/2023	Reviewed By DS KEVIN SUTTER, ID#01 <i>Kevin Sutter</i>
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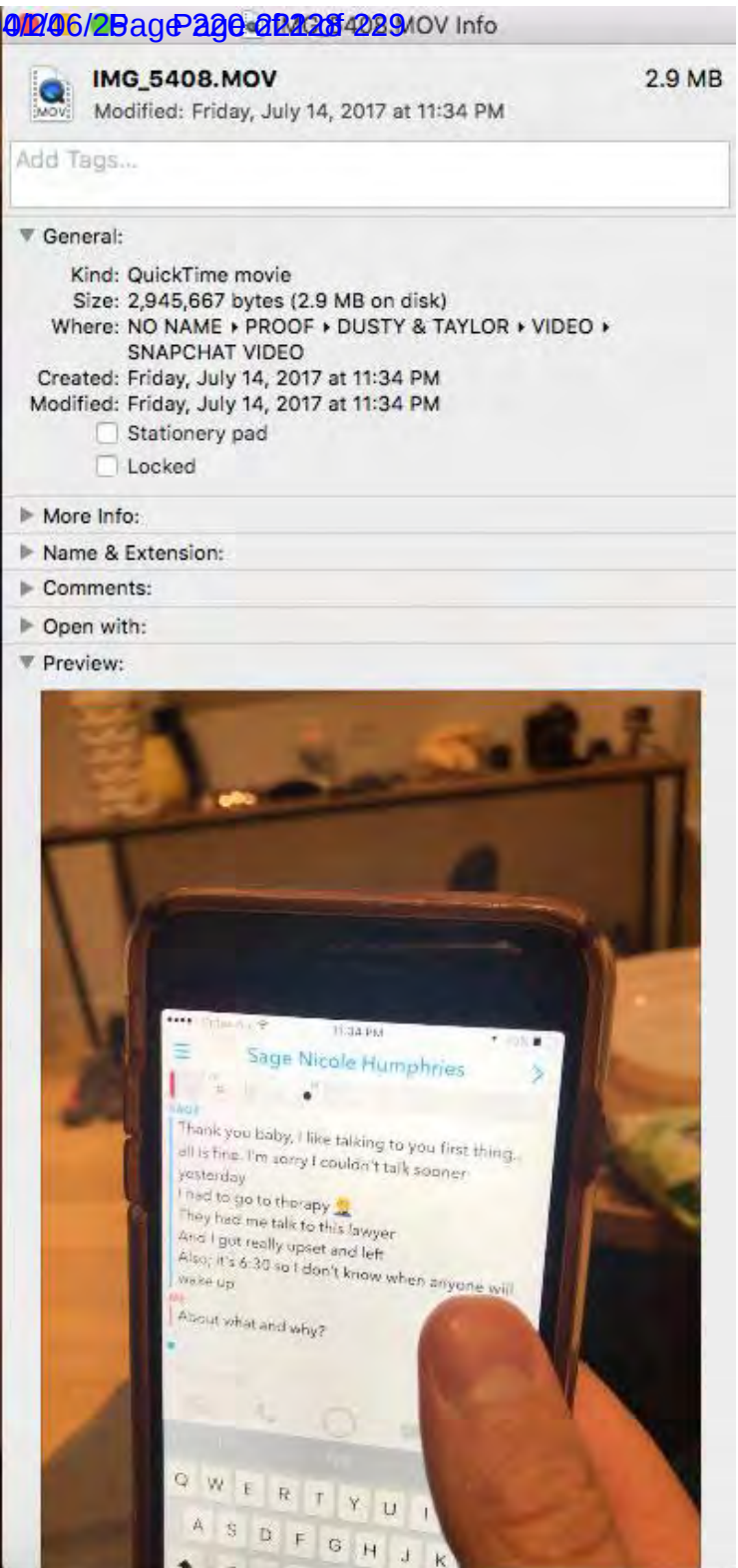
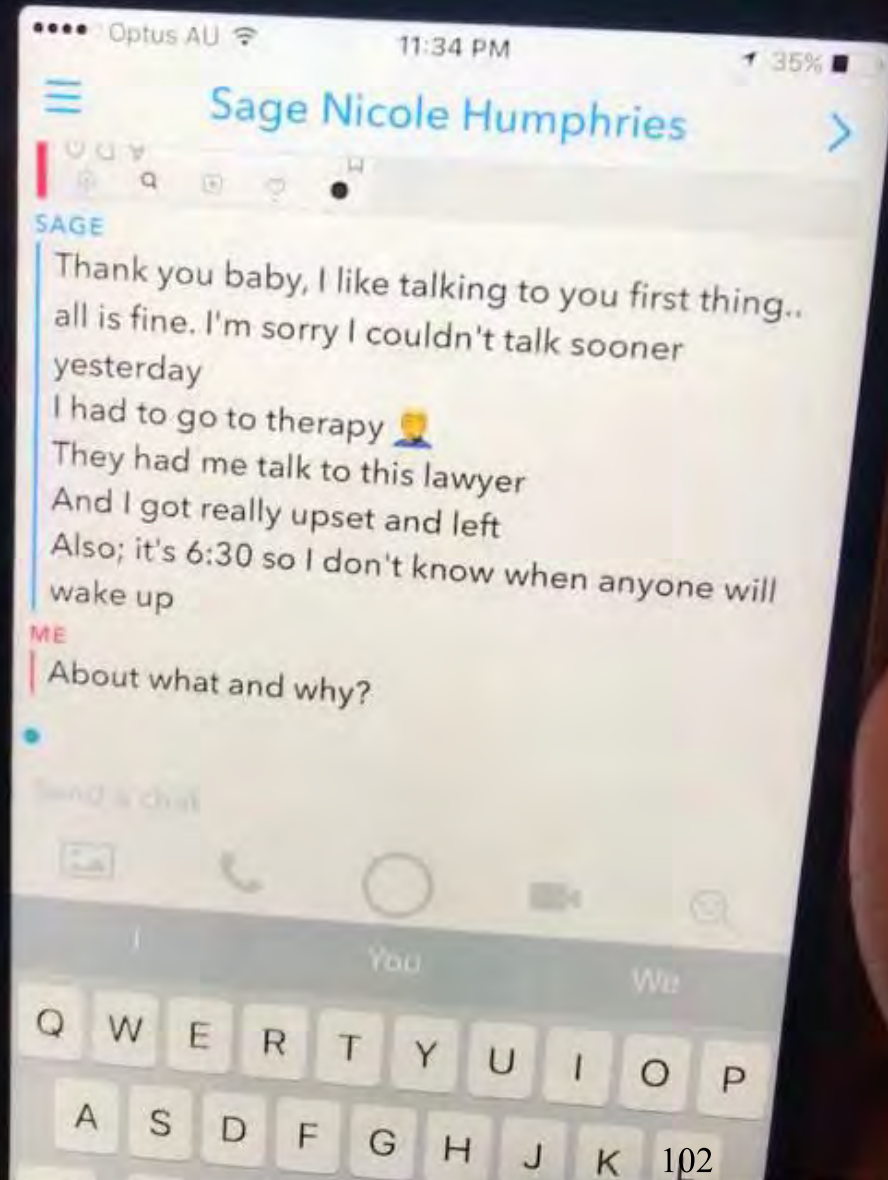
Supervisor Signature

Case No. 2023-018418

# EXHIBIT M

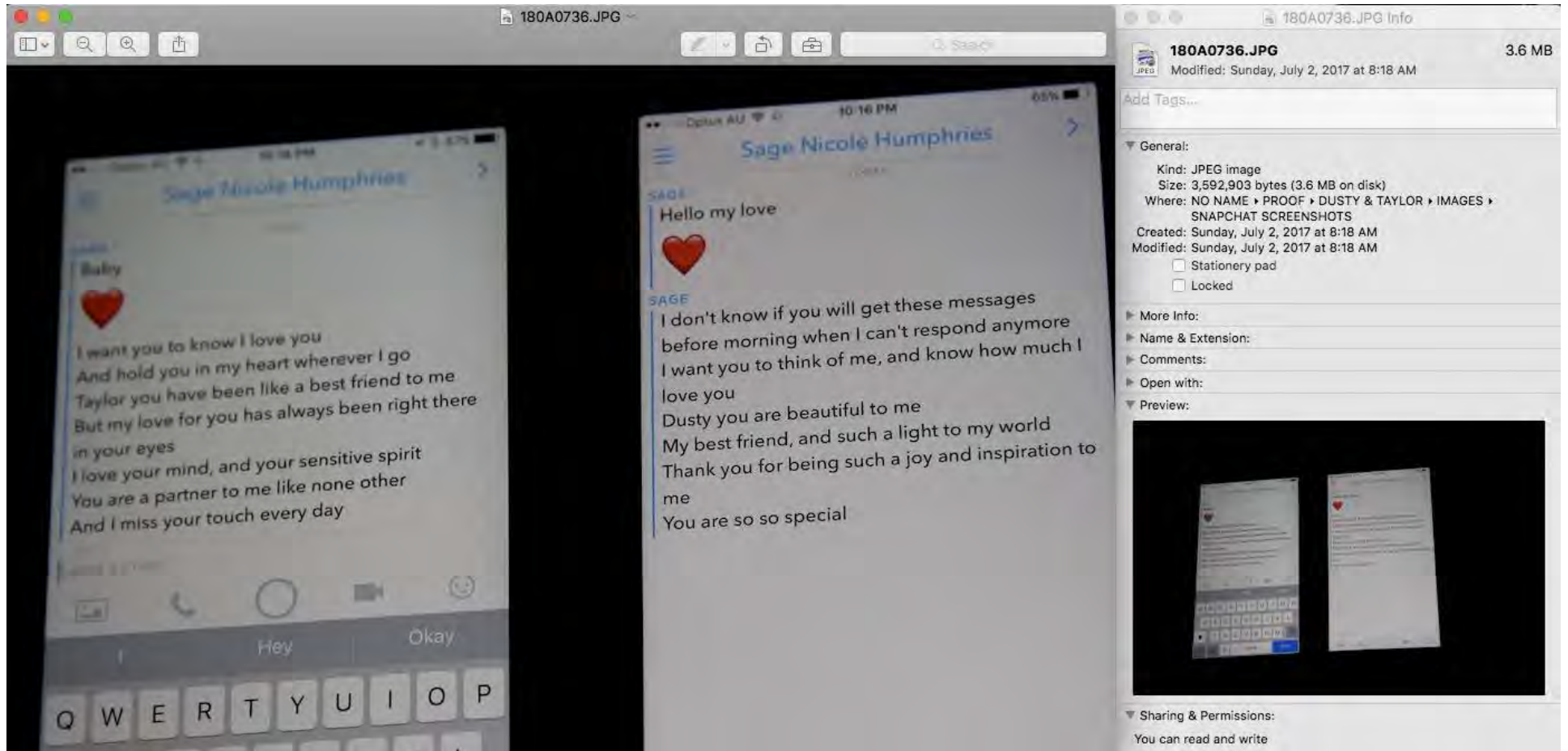


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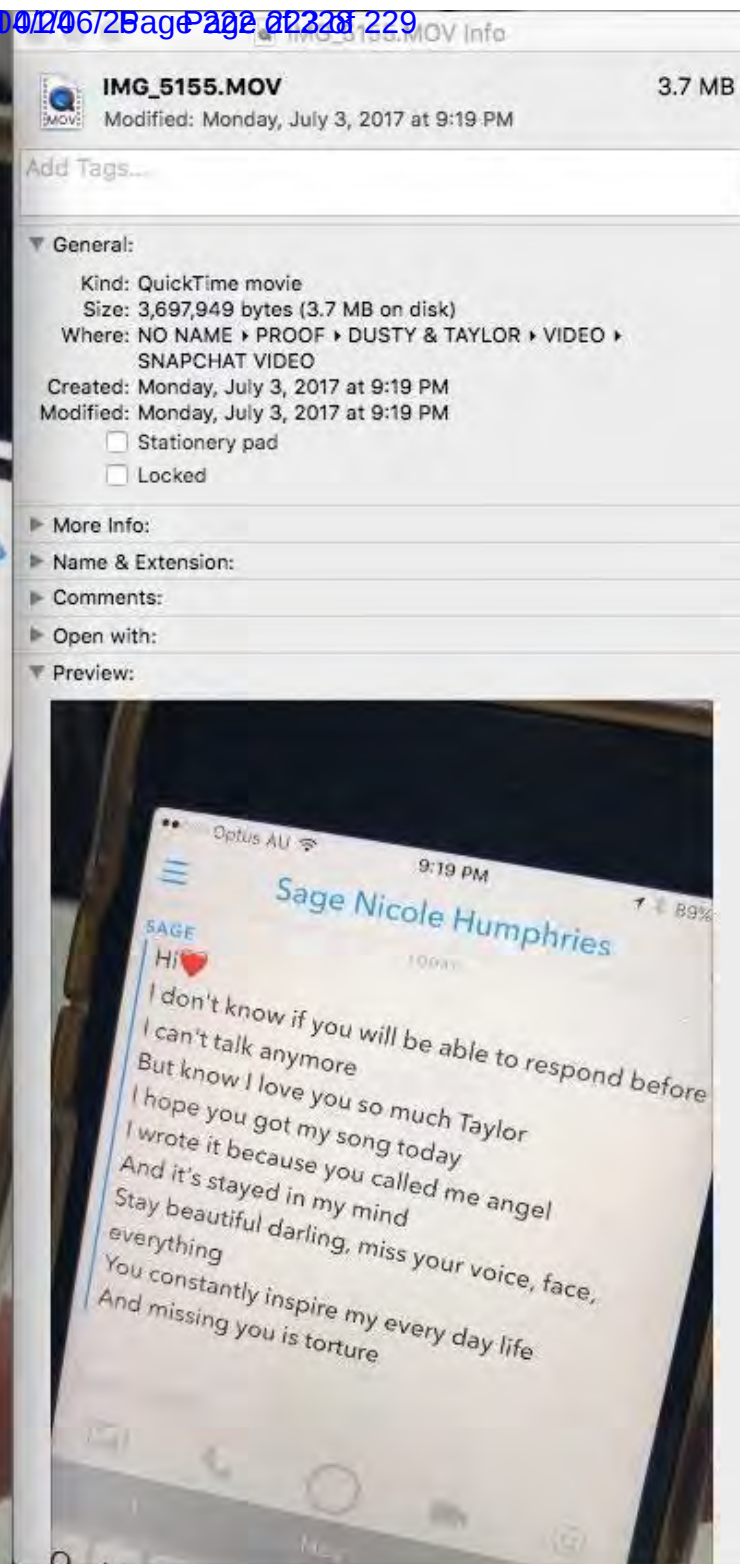
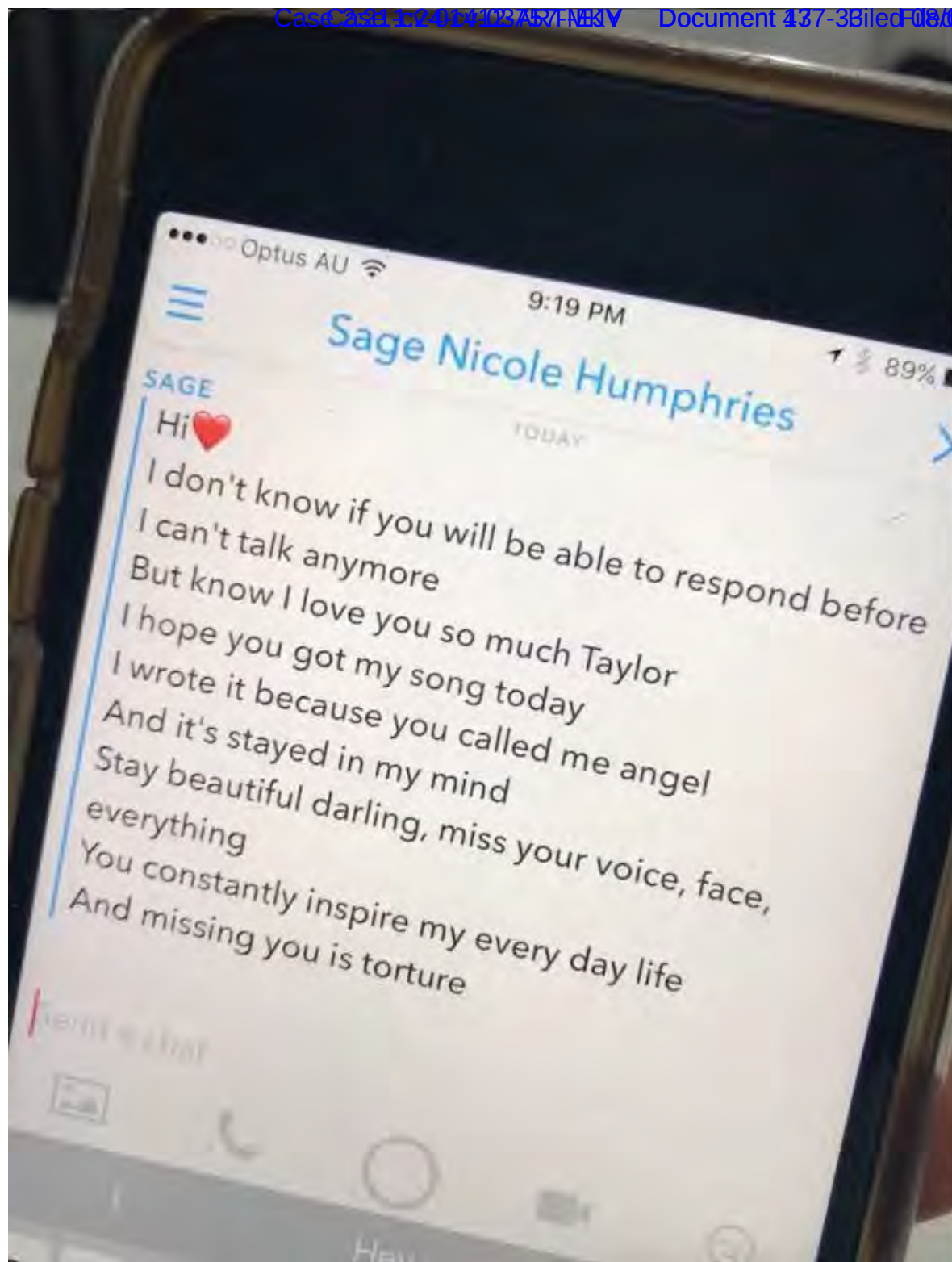




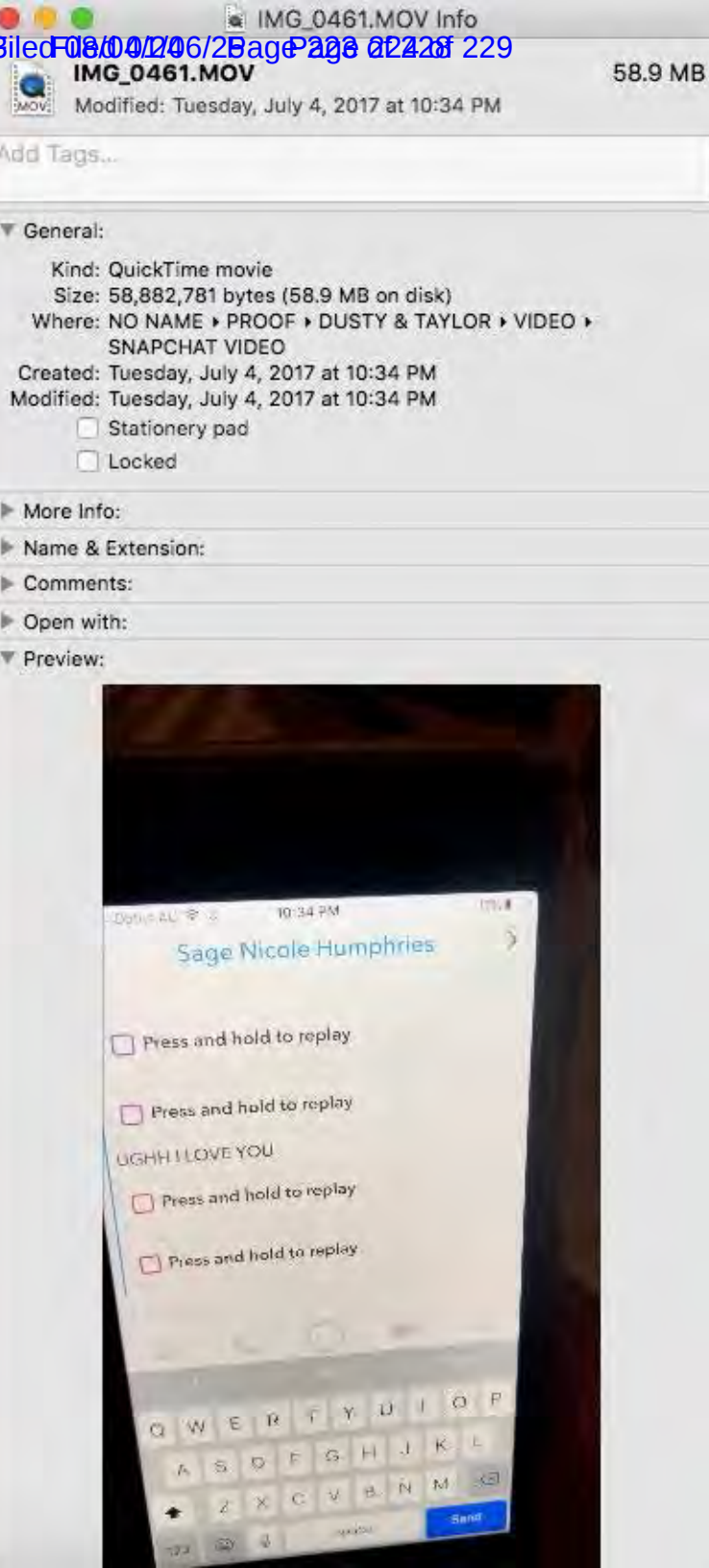
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96.6 MB

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SNAPCHAT VIDEO

Created: Friday, July 7, 2017 at 9:53 AM

Modified: Friday, July 7, 2017 at 9:53 AM

☐ Stationery pad☐ Locked

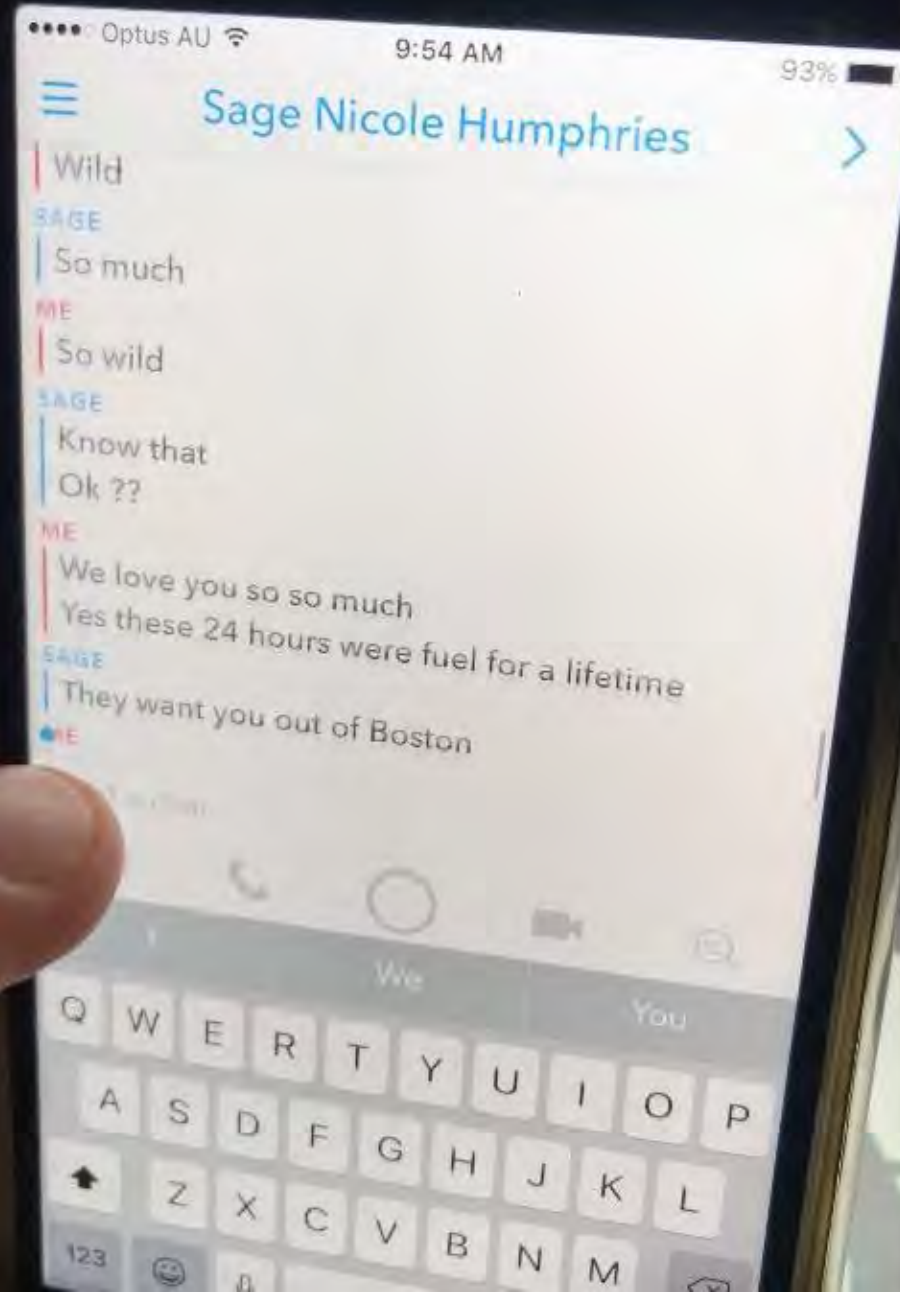
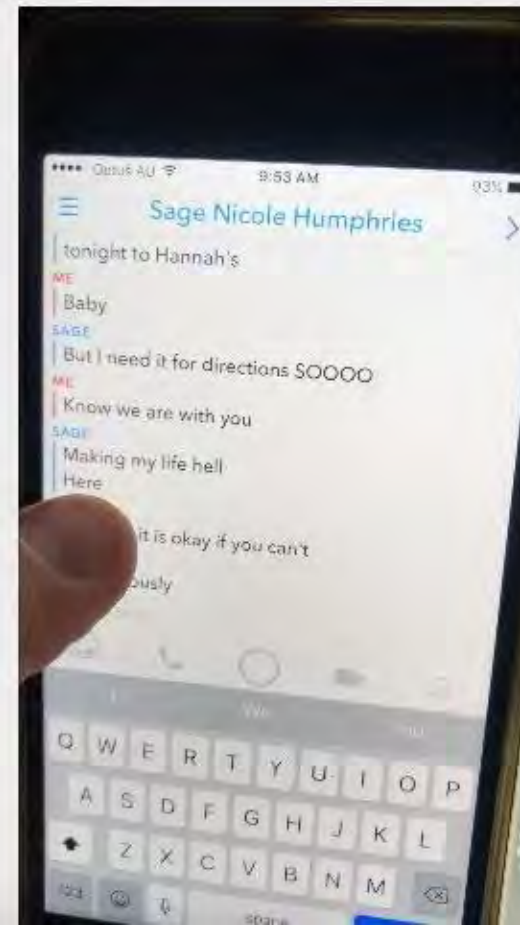
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► Name &amp; Extension:

► Comments:

► Open with:

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96.6 MB

Modified: Friday, July 7, 2017 at 9:53 AM

Add Tags...

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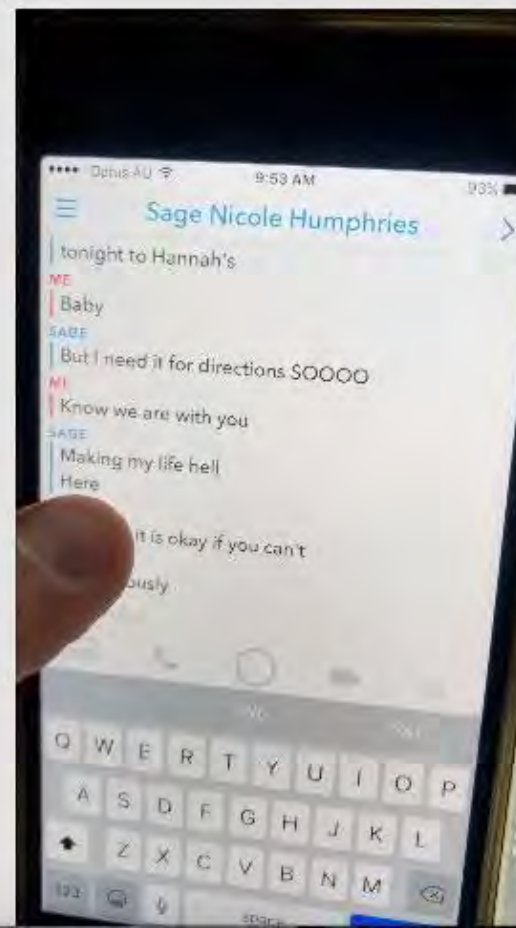
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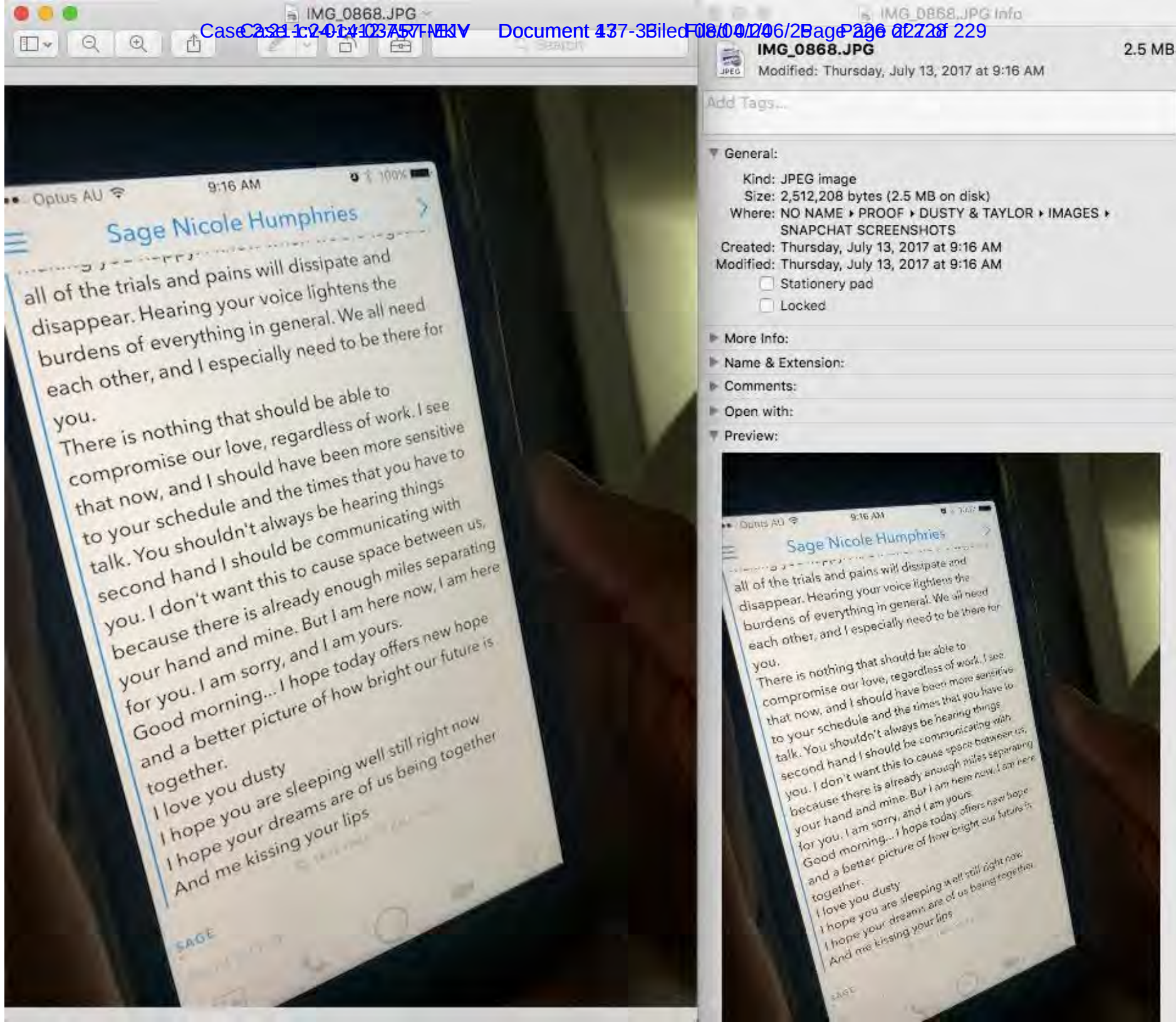
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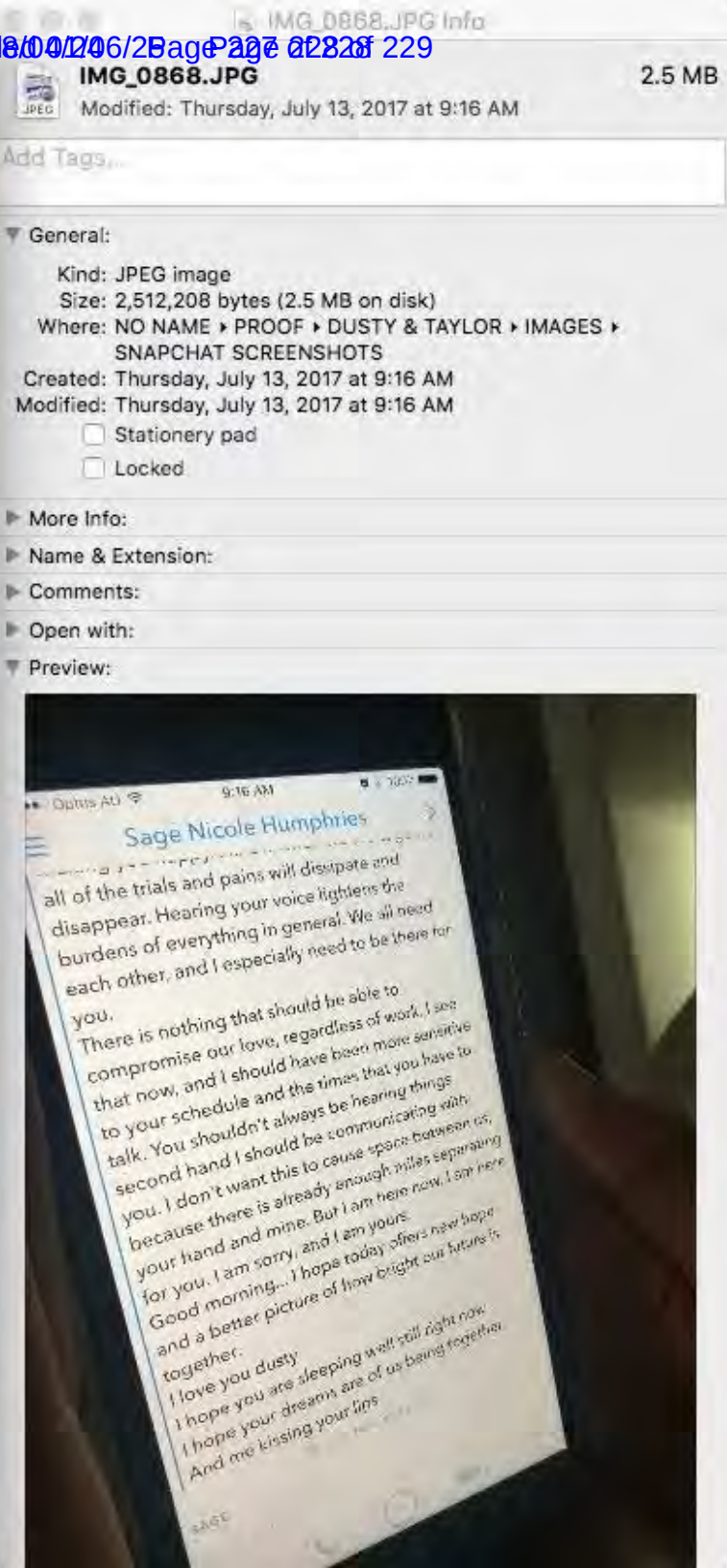
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